P.O. Box 189

Hazelwood (St. Louis County), Missouri 63042-0189

314/389-8822

(FAX) 314/389-1765

May 20, 1993

TO: U. S. Environmental Protection Agency

Region VII

726 Minnesota Ave.

Kansas City, Missouri 66101

ATTN: David A. Hoefer, Assistant Regional Counsel

RE: Information Request Dated April 20, 1993 HLC Properties, Inc. d/b/a Clark Properties c/o Harold Clark, Registered Agent Former GAF Corporation Facility 9215 Riverview Blvd.

St. Louis, Missouri

Dear Mr. Hoefer:

In answer to the above-captioned request for information, we have the following comments and responses:

QUESTION 1

Identify all persons consulted and all documents reviewed in the preparation of responses to this Information Request.

ANSWER 1

- (a) Harold L. Clark, Wayne Weidemann and Frank L. Pellegrini.
 - (i) Harold L. Clark, Chairman P. O. Box 189
 Hazelwood, Missouri 63042
 (314) 389-8822
 - (ii) Wayne Weidemann, Vice President
 P. O. Box 189
 Hazelwood, Missouri 63042
 (314) 389-8822

(iii) Frank L. Pellegrini, Attorney 701 Market Street, Suite 390 St. Louis, Missouri 63101 (314) 241-7445 07KF

30290591 Superfund

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of Harold L. Clark, entitled "Riverview Hall Industrial Properties Environmental Correspondence" and "Riverview Hall Industrial Properties Super Fund Environmental Clean-Up", and a file of Frank L. Pellegrini entitled "Riverview Hall Properties-EPA Information".

(c) HLC Properties, Inc. has never owned or had an ownership interest in the site. HLC Properties, Inc. works pursuant to a Management Contract for the property, which includes leasing, lease administration, and selling tenant space.

Harold Clark and E.R. Emerson (address unknown), as individuals, purchased the site from GAF Corporation (1361 Alps Road, Wayne, NJ 07470, phone 201-628-3000) on or about September 17, 1986. Subsequent to the purchase, the above individuals formed a partnership which operated as Riverview Hall Industrial Properties. The Partnership purchased the site in November of 1986. Harold L. Clark subsequently bought out E.R. Emerson's interest in the partnership and the property is now owned and titled in the name of Harold L. Clark and Jewell Clark, his wife.

The site was subdivided in January of 1993 into two plats, one containing the Secured Asbestos Cement Pile and the other containing the Redevelopment project. The Subdivision plat is recorded in Plat Book 284, Page 93 of the St. Louis County Recorder of Deeds Office in Clayton, Missouri. Harold L. Clark (Respondent) is answering this "information request" as HLC Properties, Inc. simply manages the site.

QUESTION 2

Identify all persons, including Respondent's employees, who have knowledge, information or documents pertaining to the generation, use, treatment, storage, disposal or other handling of hazardous substances at the site.

ANSWER 2

All asbestos generation, use, treatment, storage, disposal, etc., prior to the purchase of the site by Respondent, was in the control of GAF Corporation. Respondent has no knowledge of specifically named GAF employees responsible for such activity. The only exception are names of GAF employees which appear on documents furnished by GAF Corporation to Clark at the time of purchase of the site which deal with environmental conditions of the property. (Copies attached)

The property was purchased by Clark for redevelopment purposes. Subsequent to its purchase, Clark embarked on a "clean up" project which included the removal of some asbestos containing material which was identified by consultant's observation and testing. This ACM was removed and disposed of by an asbestos removal contractor, National Industrial Applicators, subsequently purchased by Waste Management Inc. All ACM removal and disposal off site was contracted to be, and to the best of Respondent's knowledge and belief, in accordance with applicable Federal, State, and Local regulations.

Persons with knowledge of this removal action are Harold L. Clark, Jerry Winter ((314)947-4494, 3980 Elm Point Road, St. Charles, Missouri 63301) and employees of National Industrial Applicators involved in the removal work (names unknown to Respondent).

QUESTION 3

Describe the nature of your activities at the Site, particularly with respect to the processing, storage, treatment, disposal, or other handling of asbestos or asbestos containing material "ACM").

ANSWER 3

None, except for the environmental clean-up work described in Answer 2 above. Other than this removal action, Clark had no other activity at the site relating to ACM. The property was purchased to be rehabilitated and redeveloped as Industrial warehousing/manufacturing space for rental tenants.

QUESTION 4

Identify who you acquired the Site from. In addition, identify the time periods during which you operated and/or owned the Site.

ANSWER 4

See Answer 1. Site (9215 Riverview Drive, St. Louis, Missouri) was purchased from GAF Corporation. The site was never "operated" by Respondent except for the cleanup, redevelopment, and leasing activities set out in Answers 2 and 3 above.

QUESTION 5

Identify any persons who operated at the Site during the time that you owned the Site. In addition, identify the activities they conducted at the Site, the time periods they operated at the Site, and the interest they held in the Site during the period of operation.

ANSWER 5

Harold L. Clark and Jewell Clark are present owners of the site. No operations of the site have occurred since the purchase from GAF Corporation. Tenants of the property are engaged in various industrial and commercial activities, none of which involve ACM. Tenants are/were New Era Group (present), MacMillan-Bloedel Building Materials (present), Recovery & Recycling, Inc.

(present), Riverview Industries Services (former tenant involved in public warehousing). All tenants are under lease and, to that extent, hold leasehold interests to their demised premises on the site, which includes ingress and egress. All tenants can be contacted at the site address given in Answer 4. Riverview Industrial Services last known address was site address given in Answer 4, present address unknown.

QUESTION 6

Identify all solid waste units (e.g., waste piles and landfills) located at the Site during the period that you owned/operated the Site. For each unit identified, provide the following information:

- a. The type and dimensions of the unit;
- b. The dates that the units was in use;
- c. The quantity and types of materials placed in the unit;
- d. The construction of the unit;
- e. How the unit was closed and what actions were taken to prevent or address potential or actual releases of asbestos or ACM from the unit; and
- f. If available, provide a map showing the unit's boundaries and the location of all known solid waste units.

ANSWER 6

- (a) The unit was represented to Respondent by GAF as a "Secured Asbestos Cement Pile". The pile was on site prior to respondent's acquisition of the property. The pile is irregular in shape and has dimensions as shown on Plat "A" attached hereto. The plat was furnished by GAF Corporation at time of purchase by Respondent.
- (b) Unknown to Respondent. All information concerning this item, to the best of Respondent's knowledge and belief, is in the possession of GAF Corporation. The "pile" was generated, maintained and closed by GAF Corporation prior to purchase by Respondent. The ACM in the buildings was removed by Respondent as

part of its clean-up/redevelopment project. See Answer 2.

- (c) Same as Answer 6(b) above.
- (d) Same as Answer 6(b) above.
- (e) All documents concerning closure and given to Respondent at time of purchase are attached hereto. All other information relative to the specific requests in this question would have to come from GAF Corporation.
 - (f) Plat "A" attached.

QUESTION 7

At the time that you acquired the Site, did you know or have reason to know that any hazardous substance was located at, or disposed of on the Site? Describe all investigations of the Site you undertook prior to acquiring the Site and all of the facts on which you base the answer to this question.

ANSWER 7

Yes. GAF Corporation disclosed the existence of the Secured Asbestos Cement Pile prior to purchase. Documents furnished by GAF Corporation represented that the closure had been accomplished under applicable environmental regulations. GAF Corporation also disclosed that the site had been operated by them, or subsidiaries, in the manufacture of items which either incorporated or used ACM.

Consultants were hired by Respondent to perform an extensive Environmental Survey and Clean Up Study. Also, some governmental agencies were used for evaluation. All clean-up work was performed and completed based on these recommendations and evaluations. Copies of all reports, documentation, correspondence, etc. are attached hereto.

QUESTION 8

Have you at any time since you acquired the Site performed any investigations of the soil, water (ground or surface), geology, hydrology, or air quality on or about the Site? If so, what were the result? Provide copies of all reports, etc., pertaining to such investigations.

ANSWER 8

Yes, the Environment Assessment referred to in Answer 7. See reports attached.

QUESTION 9

Have you at any time performed any removal or remedial activities with regard to hazardous substances at the Site? If so, provide copies of all documents, reports, etc., pertaining to such activities.

ANSWER 9

Yes. All work which was performed as clean up, pursuant to the Environmental Assessment, but nothing else since the completion of the work. See document attached.

QUESTION 10

Identify the acts or omissions of any persons, other than your employees, contractors, or agents, that may have caused the release or threat of release of asbestos or ACM at or from the Site.

ANSWER 10

To the best of Respondent's knowledge and belief, none.

QUESTION 11

If you have reason to believe that there may be persons able to provide a more detailed or complete response to any question contained herein or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.

ANSWER 11

GAF Corporation and the consultants, contractors and governmental agencies identified in the document attached hereto,

including but not limited to, GAF Corporation, National Industrial Applications, Waste Management, Inc., John Jurgiel and Associates, City of St. Louis, MoDNR, EPA Kansas City.

QUESTION 12

For every question contained herein, if information or documents responsive to this Information Request are not in your possession, custody or control, then identify the persons from whom such information or documents may be obtained.

ANSWER 12

See Answer 11 above. All other documents relevant to this Information Request contained in the files identified in Answer 1(b) are attached hereto. Some documents are duplicative but are attachments to various correspondence which refer to them. Therefore, they have been included.

If you have any questions, or we can be of any additional service, please contact us.

Very truly yours,

Harold L. Clark

201 628 3000

2) File



February 25, 1987

E. R. Emerson
St. Louis Freight Car
and Freight Equipment Co.
718 North 3rd Street
Suite 200C
St. Louis, Missouri 63101

Dear Ray:

Following up our conversation of yesterday, I have again reviewed the situation with our Engineering Department. With respect to the boiler, I have been assured that the boiler currently existing in the building is in operating condition and adequately designed for heating the overhead space heaters. Attached is a copy of a drawing indicating the seven heaters which were operating by the boiler which was removed.

In view of the current existing boiler, I don't see how anything has been lost. If you need our assistance in energizing or connecting the remaining boiler to the heater, please let me know.

With respect to storage charges for our processing line, I am somewhat confused by your explanation of charges. You indicated that you would charge GAF \$.20 per sq.ft. On an annualized basis for 34,000 sq.ft., this would amount to \$567 per month.

We are now coming up to the 90-day period. We appreciate your need for a storage charge. My suggestion is that such charge begin March 1, 1987, but we must resolve the amount.

Very truly yours,

GAF CORPORATION

Arthur Dresner

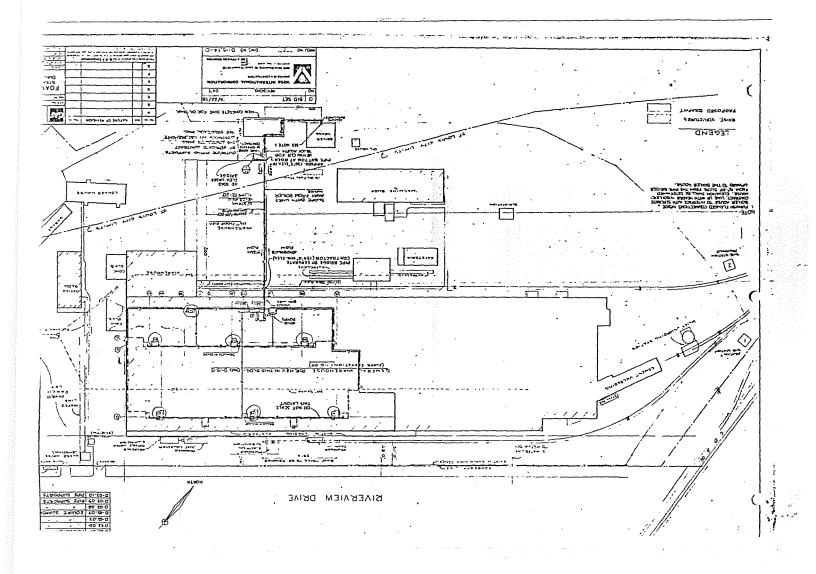
Director of Venture Analysis and Real Estate

201 (628-3684)

AD:gm

enc. (map)

cc: F. Bright
B. Lloyd



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File 6-pg

Harold L. Clark 464 Summit Avenue Hazelwood, MO 63042 March 2, 1987

Mr. Arthur Dresner G.A.F. Corporation 1361 Alps Road Wayne, NJ 07470

Dear Arthur:

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Your response to my letter of February 2nd is inconsistent with my telephone conversations with you and Mr. Brght of your engineering staff.

With respect to the boiler and your comments:

- 1) that the boiler was part and parcel of the process equipment which was not subject to the sale and which G.A.F. had intended to remove.
- 2) the building was never provided with heat and this boiler did not provide that service.
- 3) that you understood that some small space heaters in the process area were operated by this boiler.
- 4) that you would see to it that the other boiler is hooked up to operate these space heaters.

My response to those comments point by point are as follows:

- l) a) on my initial inspection of the building with Jerry, your former maintenance man, it was obvious that there were two boilers. I was told by Jerry that the old boiler was inoperable, and that the new boiler was in excellent condition and provided heat for the steam space heaters located inside the building at various locations. I was not made aware that it was connected to the process equipment.
- b) this boiler was not included on the detail list of process equipment as part of the sales contract to be removed by G.A.F..

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- 2) the building formerly used by G.A.F. for processing has a relatively new steam heat system with large steam space heaters which provides heat to an area of approximately 80,000 floor feet and 3,200,000 cubic feet of space. This steam was provided by the boiler which was removed.
- 3) as described in Point #2, these space heaters are large volume.
- 4) old boiler is inoperable and unacceptable to us.

When I was advised that G.A.F. had removed this boiler and called you I was assured that if the above was true the matter would be resolved and suggested I call Mr. Bright, which I did.

He was aware that the boiler had been removed but was not aware that it provided heat for the building. In a later conversation with Mr. Bright he had determined the boiler had in fact been sized to provide steam for both, and a trip to the property may be required to analyze the resolution.

I suggest that you, or someone from your engineering staff, meet me and my boiler man at the property and determine who is correct.

In summary, I expect the boiler I purchased to be returned and reconnected to service, or a reasonable compensation for a smaller boiler which will satisfy the needs of the system.

With respect to the removal of your process equipment and the rental fees for the interim period for which they are stored:

As to the date that the rental fee starts, I accept your 90 day period from the date of purchase as being reasonable.

The date of closing was November 21, 1986. So G.A.F. rental accordingly will being on February 21, 1987.

As to the fee of \$8,000.00/per month, it was my understanding that Ray Emmerson quoted that fee to you, and that it is below the fair Market Value of the space.

We have been told that the moving of this equipment is emminent and our quote of \$8,000.00 a month will be firm for 2 months. I agree with you that this rate should be negotiated and I suggest that it be done promptly.

Mr. Arthur Dresner
Page 3
March 2, 1987

We have leased the entire property to a professional warehousing company as of February 1, 1987, they have been made aware of where we stand in this matter to date and are paying us rental for the space occupied by G.A.F., as well as, insurance, utilities, building maintenance and security. They are to receive the benefits of a fair Market Rental Rate from G.A.F..

We will stand by our quote of \$8,000.00/per month to you until April 21.

We will appreciate your negotiating directly with Riverview Hall Service, Inc., Mr. Richard Goode, for space and rental fees from that date forward. I will ask him to contact you by telephone as soon as possible.

I would appreciate your immediate attention to the resolution of the boiler and rental fees for the storage of your equipment. I will make myself available at your earliest convenience.

Yours truly,

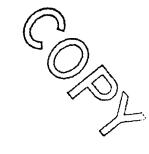
Harold L. Clark

Alwold & Jack

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7-12 F-117.



Harold L. Clark 464 Summit Avenue St. Louis, MO 63042 March 27, 1987

Mr. Arthur Dresner GAF Corporation 1361 Alps Road Wayne, New Jersey 07470

> Re: Former GAF Property 9215 Riverview Drive St. Louis, Missouri

Dear Art:

I believe that we are in agreement on the responsibility of repair by GAF upon the removal of GAF equipment.

GAF is only to repair openings in the roof and walls that are existing for the purpose of the equipment. An example would be that if a stack is remvoed from the roof the opening would be repaired by GAF. GAF or it's contractor has also agreed to be responsible for damage caused by the removal of equipment. I agree that GAF is not responsible for filling pits in the floors.

With respect to the rental for space occupied by GAF I have enclosed my evaluation of my tenant's costs for your review. I have alos called Rich Goode and asked him to mail you some sort of backup for his charges to you. It appears to me that his charges are reasonable. If you agree then I suggest the following as a resolution:

February 8/28 x 8000 =

\$2,288.00

and 8,000.00/month thereafter. If you will mail me a check for the amount of \$18,288.00 next week, it will be greatly appreciated and will pay your rental through the month of April.

Make your check payable to Riverview Hall Industrial Property and I will give Riverview Industrial Services, Inc. (Tenant) a credit to apply against their April rent.

Harold Clark

PRO FORMA LETTER

Mr. Arthur Dresner GAF Corporation 1361 Alps Road Wayne, New Jersey 07470

RE: FORMER GAF PROPERTY 9215 Riverview Drive St. Louis, Missouri

Dear Art:

This will reference all of the previous correspondence back to and including letters of February 2nd, 1987, concerning a replacement of the boiler in the 9215 Riverview Drive property. As the heating season will be upon us in the next four months, and since no amicable disposition of this matter has been achieved to date, we would like to set out our very clear position in this matter with respect to the boiler in the hope that we may have an amicable disposition.

The boiler which was removed from our premises was not the subject matter of any contract excepting it from the purchase. It was not on any exhibit attached to any contract, and indeed as we have all found out, operated the heating system in the facility. Since we purchased the building "as is," along with the existing heating system, and since you have removed the boiler to operate the heating system, it is incumbent upon you to replace the boiler that was removed and reconnect so the heating system is in an operable condition, or to furnish a new boiler of such size and capacity that it will meet the requirements of our heating system.

I would like your firm commitment to repair or replace this boiler, and make our system operative, within ten (10) days of the date of this correspondence. If we do not resolve this matter amicably, then I have no choice but to take other action to secure our position.

Very truly yours,

Harold L. Clark

Harold L. Clark 464 Summit Avenue Hazelwood, MO 63042 July 13, 1987

Ms. Munn GAF Corporation 1361 Alps Road, Bldg #2 ' Wayne, NJ 07470

Dear Ms. Munn:

We have enclosed for your review a copy of two additional proposals for the boiler replacement.

As you requested in our conversation of July 2, 1987, we discussed with the bidders, the possibility of installing a used boiler. None of the contractors we are dealing with have located one, but are searching. We would accept a used boiler only if it were in good condition. They estimate the savings, if they do located one, to be \$10,000.00 to \$12,000.00.

We hope that GAF appreciates and understands that we are going to extremes in our efforts to resolve this matter with you. We must have an early response from you so that we can keep our commitment to our tenants.

With respect to our rent due from GAF for July, you had indicated you would walk the invoice through and we should receive it the week of July 7th. It has not come in, please check on it and advise me of status.

Yours truly,

Harold L. Clark

Harold L Clark

nr

c: Mr. Frank Pellegrini, Esq.

& Eisele, Inc.

810 Hanley Industrial Court St. Louis, Mo. 63144 (314) 968-5350

QUOTATION TO:

CLAYCO CONSTRUCTION CO.

462 SUMMIT AVE.

HAZELWOOD MO. 63042

MR. BARNETT ATTENTION:

		Dat	e. AP	KTT (, .	<u> </u>
		Proposal No.:				
Project:	REPLACE					
	BOILER					
Architectu	G.A.F.	BUIL	ING			
_						

WE ARE PLEASED TO QUOTE YOU ON THE FOLLOWING MATERIAL FOR THE ABOVE JOB

PRICE

WE WILL FURNISH 1 BURNHAM THREE PASS WETBACK 500 HORSEPOWER STEAM BOILER WITH A DESIGN PRESSURE OF 150 PSI. BOILER TO BE NATURAL GAS FIRED AND TO INCLUDE ALL NECESSARY SAFETY CONTROLS.

WE WILL FURNISH 1 BOILER FEED/CONDENSATE RETURN UNIT AS MANUFACT URED BY INDUSTRIAL STEAM CORP. HAVING THREE PUMPS.

WE WILL FURNISH ONE BOILER BLOWDOWN SEPARATOR WITH AFTER COOLER.

WE WILL FURNISH 1 BOILER STACK WITH DOUBLE WALL AND INSULATION BETWEEN WALLS APPROXIMATELY 40 FT. TALL AND 28 IN. DIAMETER.

ALL OF THE ABOVE FOR THE SUM OF NINETY EIGHT THOUSAND SEVEN HUNDRED \$98,797.00 NINETY SEVEN DOLLARS-----

INSTALLATION OF THE ABOVE EQUIPMENT, USING EXISTING STEAM HEADERS

BOILER TO BE MOUNTED ON EXISTING CONCRETE PAD. WE WILL PROVIDE NECESSARY PIPING, WIRING, STACK ERECTION AND GYE WIRES FOR STACK, MATERIALS AND LABOR TO HAVE A WORKING SYSTEM IN THE 90,000 SQ. FT. BUILDING THAT NOW CONTAINS THE WING STEAM HEATERS.

WE DO NOT INCLUDE ANY SALES TAX. WE DO INCLUDE FREIGHT ON EQUIPMENT TO JOBSITE.

TERMS; 90% MATERIAL AND LABOR EACH 30 DAY PERIOD. BALANCE UPON COMPLETION. ____NET 30 DAYS.

DELIVERY F.O.B.

RECEIVED APR - 7 1587

By Mersial Persele



DIVISION OF AQUA-CHEM, INC. P. O. BOX 421 • MILWAUKEE, WISCONSIN 53201

PROPOSAL

Page 1 of 3 Pag

To

Hall Street Properties

Attn: Mr. Ray Emerson

Riverview Blvd.

Address

St. Louis, MO

SUBJECT:

NEW BOILER

Date

July 9, 1987

Proposal No. STL-69-787

From:

The Trabue Package Boiler Co

2932 So. Brentwood

St. Louis, MO 63144

The following proposal is offered for your consideration. All items listed below have been sized to provide the essential equipment required for reliable heating of your facility. Installation of this equipment is described below and shall be complete through instruction to owner's representative of proper operation once installed and started.

We propose the following:

ONE (1) - Cleaver Brooks Model CB700-250-15 Steam Boiler, to be fired on Natural Gas. The unit is built to ASME and is designed in accordance with Section IV of the ASME Code.

Capacity:

8,625 lbs./hr.

Fuel Input:

10,400 cu.ft./hr.

Efficiency:

82% at 100% operation

- ONE (1) Cleaver Brooks Duplex Condensate Return System, Model DT-P-1-1, complete with 200 gallon tank and two (2) pumps each rated at 45 gpm with 1.5 HP motors.
- Cleaver Brooks Econoline Water Softener, Model ECB-60 sized to soften ONE (1) water for initial fill at a rate of 10 gpm and capacity of 60,000 grain
- ONE (1) Cleaver Brooks Chemical Feed System, Model 30-P-1-V-5, with 30 gallon storage tank and adjustable chemical pump.
- ONE (1) Lot-All required pipe, valves, and fittings for proper operation.

Installation includes but is not limited to the following requirements:

- Move and locate boiler and accessories into boiler room
- Upgrade room to fire code requirements
- Install approximately 125' of 6" insulated steam piping to existing run Install approximately 225' of 2½" gas piping to boiler
- Install approximately 65' of 4" insulated condensate piping to existing run
- Install fresh water make up to tank 6)
- Inter connect boiler and accessory items 7)
- Provide and install boiler stack thru roof complete with stack cap and 8) roof thimble
- Pipe drains and required vents
- Provide electrical connection of all items 10)
- 11) Start-Up and Training
- 12)
- 13) Remote condensate system

SEE PAGE 2.....



OIVISION OF ADUA.CHEM, INC. PO BOX 421 • MILWALIKEE, WISCONSIN 53201 PROPOSAL

Page 2 of 3 Pages

То	Hall Street Propert	ies		Proposal	No.	STL-69-787
Address S	Riverview Blvd. St. Louis, MO				July 9, 1987	
	NEW BOILER		Date From:		The Trabue Package Boiler Co 2932 So. Brentwood	
	Attn: Mr. Ray Emers	on			St.	Louis, MO 63144

	All work will be pe neat and workmanlik		led workmen usin	g their	c Owr	n tools in a
	Cleaver Brooks' Age workmen efforts unt responsibility for	il completion o	of job and will p			
	TERMS: Boiler and . Labor and I	nstallation - F b	let 30 Days from Progress payments willed no more th due 15 days after	coveri an 30 d	ing w Bay i	
	PRICE: Equip	ment and Labor,	as listed above			\$ 89,910
	State and Local Taxis subject to tax uninvoicing.					
FOB			allowed toto be added		***************************************	, unloading by others
Current Chai	acteristics	A	pprox. Shipping Weigh	t		
Payment Ter	ms See Above		pproximate Shipment a rder and Complete De			
PRICE AD	JUSTMENT all prices in t	his proposal are s	ubject to price adjust	ment in	accor	dance with the attached Price
	nt Policy No6_		· ·			
The Contact of the Co	Eleaver-Brooks Division of Aque noted, exclusive of all taxe with the provisions of paradany contract resulting from	ua-Chem, Inc. ("Cons. Prices quoted are graph 1 (c) on the renth this Proposal is so	npany") offers to furnis firm for 30 days from da werse side. This Propos ubject to acceptance b , other than those set fo	ate of Propagate o	posal ject to mpan in, sha	nt described herein for the purbut are subject to adjustment in withdrawal at any time without y at Milwaukee, Wisconsin. No all be binding on the Company.
	THE TELLING AND CONDIT	110113 01 3ALL 011	THE MEVEROL OIDE	ALE LA		ROPOSAL FURNISHED BY:
Date ACCEP	TED1!	9 this propos	rn one signed copy of al or your purchase or- nced to this proposal	TRABI		ACKAGE BOILER COMPANY
		number ar Brooks Div	nd date to "Cleaver- vision of Aqua-Chem, are of your Cleaver-			·
Ву	PURCHASER		es Representative.	GREG	SLAC	K SALES REPRESENTATIVE



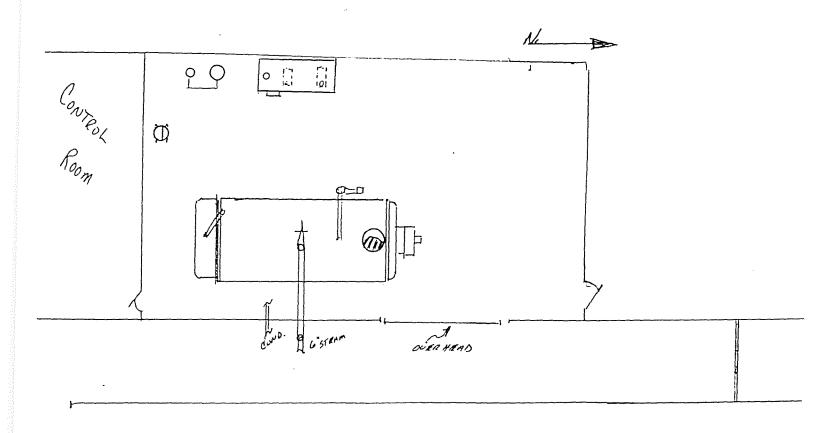
Price Adjustment Policy - 6

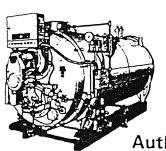
The price quoted in the Company's proposal is firm for thirty (30) days from the proposal date if shipment of the Equipment is made within eight (8) months from the date of the Company's proposal or the Company's contract document if no proposal was issued. If the Equipment is not shipped within such eight (8) months, the contract price shall be increased by one percent (1%) for each thirty (30) days or fraction thereof that shipment is deferred beyond eight (8) months from the date of the Company's proposal or contract document.

Trabue Package Boiler Cc pany

2932 South Brentwood St. Louis, Missouri 63144 Tel: 314-968-1177 2717A South 88th Street Omaha, Nebraska 68124 Tel: 402-390-0288

2603 Ingersoll Street Des Moines, Iowa 50312 Tel: 515-282-6300 8700 Monrovia Lenexa, Kansas 66215 Tel: 913-888-4672





Authorized Cleaver Brooks, Sales, Parts and Service-

Heatrol Services, inc.

1724 RUDDER IND. PK. DR. FENTON, MO 63026 (314) 343-5599

July 10, 1987

Clayco Construction 464 Summit Hazelwood, Mo 63042

Attn: Tom Barnewolt

Re: GAF Building

Gentlemen:

We propose to furnish and install a replacement boiler for the GAF Building at 9215 Riverview. It is understood that this boiler will be used to heat a 100,000 sq. ft. area of the existing 200,000 sq. ft. building, maintaining a 40° to 45° temperature.

An existing storage room will be utilized as the boiler room. Fire rated walls, ceiling, and door will be included. Gas piping shall be run from the existing meter location to the boiler room, approximately 300'. Steam and condensate return piping will be tied into the existing piping, approximately 140' from the new boiler location. Also included is the installation of the existing condensate return pump.

All necessary piping, wiring, flue piping, permits, etc. for a turn key job are included.

Not included in this quote are any charges incurred by utility companies, such as Laclede Gas, although contact was made and no charges are anticipated.

This quote We propose to perform this work for a net sum of \$ 76,000.00. is for budget purposes only and is not an offer to sell.

If you have any questions, please feel free to contact me.

Kellu/Waymon/

Estimator



June 22, 1987

Frank L. Pellegrini, Esq. Suite 400 Chouteau Center 133 S. Eleventh Street St. Louis, MO 63102

Riverview Hall Industrial Properties with GAF Corporation

Dear Mr. Pellegrini:

Your June 9, 1987 letter to Arthur Dresner has been referred to me for response. As your client has probably told you, the rent for May and June has now been paid. GAF had received no rent invoice for either month and its accounting and control procedures required an invoice before payment could be made.

Like your client, GAF is interested in disposing amicably of any issue relating to the boiler that was removed from the plant. I understand that a GAF representative will contact Mr. Clark shortly to discuss a proposed solution.

Sincerely yours,

Stephen A. Block

Deputy General Counsel

SAB:SMK/0240W

cc: F. Bright

A. Dresner

R. Munn

Harold L. Clark 464 Summit Avenue Hazelwood, MO 63042 April 29, 1987

GAF Corporation 1361 Alps Road Building #2 Wayne, New Jersey 07470

Attn: Ms. Rose Ann Munn

Dear Ms. Munn:

Thank you for delivering the GAF check for rent due for the storage of your equipment. The check in the amount of \$18,288.00 pays through April. Eight Thousand (\$8,000.00) Dollars will be due May 1st and I hope to receive the payment timely.

At our meeting of April 27th, yourself, Fred Brite, and I had discussions concerning the resolution of the boiler replacement and the removal of GAF Owned Equipment.

With respect to the boiler, it is my understanding that I am to resolve that issue with Art Dresner.

With respect to the removal of GAF Owned Equipment, we discussed the list of GAF Owned Equipment which was Exhibit A of our purchase agreement with GAF which you and Fred indicated that you had not seen. I have enclosed a copy for your review.

It is the responsibility of GAF to remove all equipmentitemized on this list from the property at GAF's expense in accordance with our purchase agreement.

I have a commitment from my tenant that he will cooperate in any reasonable manner to facilitate this operation for GAF.

It will be necessary for GAF to present a written plan and a schedule for my approval prior to starting your removal operation and this plan should include all equipment on Exhibit A. I will then get with my tenant and coordinate his operation with your move. I look forward to hearing from you.

Yours truly,

Harold L. Clark

Husle Fllack

ny

enclosure

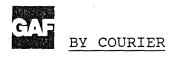
ST. LOUIS DRETHANE MANUFACTURING EQUIPMENT

1 BELT DRIVE (36") CONVEYOR

1 PALLETIZER

1 ROLL-OUT CONVEYOR

```
1 60-GAL. PUMP & MOTOR FOR POLYOL UNLOADING WITH 3" HOSE
 1 60-CAL. PUMP & MOTOR FOR ISO UNLOADING WITH 2" HOSE
 4 ISOCYANATE STORAGE TANKS (15,000 GALS.)
 7 60-GAL. PUMP & MOTOR FOR ISO TRANSFER
 2 ISO COOLING/HEATING EXCHANGERS
 3 POLYOL STORAGE TANKS (15,000 GALS.)
 2 CO-GAL. PUMP & MOTOR FOR POLYOL TRANSFER
 2 POLYOL COOLING/HEAT EXCHANGERS
 1 HIX TANK COMPLETE WITH SCALE & MIXER (3,000 GALS.)
 1 HOLD TANK WITH MIXER (3,000 GALS.)
 1 HOLD TANK WITH MIXER (3,000 GALS.)
. 1 ISO DAY TANK, NO MIXER (1,500 GALS.)
 4 HEAT EXCHANGERS (ALL FOUR TANKS LISTED ABOVE).
 1 SILICOYE STORAGE TANK (6,000 GALS.)
 1 30-GAL. PUMP & MOTOR FOR SILICONE TRANSFER
 1 HEAT EXCHANGER
 1 FLAME RETARDANT TANK (5,000 GALS.)
 1 30-CAL. PUMP & MOTOR FOR FLAME RETARDANT TRANSFER
 2 HEATING & COOLING UNITS (5 TONS)
 1 AIR COMPRESSOR (15 H.P.)
 2 AIR COMPRESSORS (50 H.P.)
 2 AIR DRIERS
 1 PERLITE FEED CONVEYOR
 2 PERLITE LIFT TABLES
 2 FELT UNWIND STANDS (TOP & BOTTOM)
 2 5-TON HOIST LIFTS (MOVABLE)
 1 PERLITE DUST COLLECTION SYSTEM
 1 PREHEAT CONVEYOR & HEATERS
 I ISO P.T.R. TANK (200 GALS.) WITH SCALE
 1 POLYOL P.T.R. TANK (200 GALS.) WITH SCALE
 1 POLYOL PUMP & MOTOR (10 GALS.)
 1 ISO PUMP & MOTOR (10 GALS.)
 3 POLYOL BOSCH PUMPS WITH 30 H.P. MOTOR
 6 COMPLETE METERING UNITS FOR EACH STREAM
 1 LAMINATOR (112 FEET) WITH HEATING SYSTEM & CONTROLS (50 H.P. DRIVE
   SYSTEM
 2 SIDE THIM SAWS (20 B.P.)
 1 TRANSFER CONVEYOR
1 DUST COLLECTION SYSTEM FOR ALL SAWS
 1 50 H.P. D.C. DRIVE CROSS CUT SAW
1 POWERED CONVEYOR SYSTEM (4 INCHES)
 1 CANG SAW (12 FOOT) HYDRAULIC DRIVE SYSTEM
 1 "V" BELT TRANSFER CONVEYOR
 1 JUMP CONVEYOR (REVERSIBLE)
 1 SECONDARY PALLETIZER & CONVEYOR
1 RUN-OUT ROLLER CONVEYOR
1 INCLINE BELT DRIVE (48" WIDE) CONVEYOR
1 ACCO BUNDLE STACKER
2 SMALL (6") BELT CONVEYORS
1 90° ANGLE POWERED CONVEYOR
1 PALLET DISPENSER
```



And A

August 11, 1987

Frank L. Pellegrini, Esq. Suite 400 Chouteau Center 133 S. Eleventh Street St. Louis, MO 63102

Riverview Hall Industrial Properties with GAF Corporation

Dear Mr Pellegrini:

As we discussed, I have revised the Release sent by Harold Clark to include Riverview Hall Industrial Properties as a party and to expand the Release from one covering only property damage claims to a general release of all claims arising out of the removal of the boiler. Please call me at your earliest convenience to let me know whether the revised version is acceptable. As soon as we receive the executed Release, the \$57,000 will be transmitted to Mr. Clark.

Thank you for your cooperation.

Sincerely yours,

Stephen A. Block

Deputy General Counsel

SAB:SMK/0312W

Enc.

cc: Rose Ann Munn (w/enc.)

RELEASE

KNOW ALL MEN by these presents that Riverview Hall Industrial Properties, a Missouri partnership, and Harold L. Clark, for and in consideration of the sum of Fifty Seven Thousand Dollars (\$57,000.00) to them paid, the receipt of which is hereby acknowledged by these presents, do forever release and discharge GAF Corporation, 1361 Alps Road, Wayne, New Jersey 07470, its subsidiaries and affiliates, any of their successors and all firms, corporations, and persons acting on behalf of any of them (collectively "GAF"), from all claims, demands, damages, liabilities, actions or causes of action, whether now apparent or which may hereinafter develop, in any way directly or indirectly arising from, growing out of or resulting from GAF's removal of a heating boiler (the "Boiler") from an industrial building commonly known as Riverview Hall Industrial Properties, commonly known and numbered as 9215 Riverview Drive, St. Louis, Missouri.

We, Riverview Hall Industrial Properties and Harold L. Clark, represent that in making this settlement with GAF, we fully understand and agree that it fully settles and discharges all claims and damages whatsoever with respect to the removal of the Boiler without being considered as an admission of liability on the part of any of the parties hereto.

this _	IN WITNESS WHEREOF, we have hereunto set our handsday of August, 1987.
	RIVERVIEW HALL INDUSTRIAL PROPERTIES a Missouri partnership
	By General Partner
	Harold L. Clark

GAF

DHL COURIER

October 26, 1986

Harold L. Clark
E. R. Emmerson
St. Louis Freight Car
and Freight Equipment, Inc.
718 North 3rd Street
Suite 200C
St. Louis, Missouri 63101

Re: GAF Property: 9215 Riverview Drive

St. Louis, Missouri

Dear Harold and Ray:

Thank you for your letter of October 20, 1986 with the executed Purchase Agreement. Returned herewith is a copy of that Agreement executed by GAF Corporation.

Accordingly, your check dated September 17, 1986 in the amount of \$50,000 has been deposited.

Please proceed to conduct whatever necessary title searches are required and advise me of any reports which you receive. I assume that we will be able to close this transaction as soon as you complete these title searches, so please keep me advised.

With respect to our equipment, I have asked our Engineering Department to contact you to see if we can make arrangements for storage of that equipment at its current location. I look forward to completing this transaction with you.

Very truly yours,

GAP CORPORATION

Arthur Dresner

Director of Venture Analysis and Real Estate

201 (628-3684)

AD:gm enc.

A DIVISION OF (Sales)

SALE CONTRACT

Coi	y or St. Louis onty of Harold L. Clark an		Missouri Emmerson	September	17 ₁₉ 86
the.	sum of Fifty Thousand and NO/10 earnest deposit and as part of the cash consider City of County of St. L. described as:	ration tor	the purchase of	, herein	after called purchaser, (\$50,000.00) i property situated in
Apr tog	proximately 206,000 S.F. industr gether commonly known as 9215 Riv	ial bui verview	lding locate Drive, St. I	d on approximat _ouis, Missouri	ely 27.75 acres
alla awa	ether with (if any) the improvements thereon and to own free and clear of encumbrances), including the line length of the length of	ng all light nd drapery stokers, oil and ranges	ting, built-in heatin / fixtures, Venetian / and gas burners, g	g, cooling and plumbing blinds, shutters, storm arbage disposal and dish	equipment and fixtures, sash and doors, screens, washer, trees and shrubs,
Fi	tich property is this day agreed to be sold to pure d not otherwise (and if not so approved earn ve Hundred Fifty Thousand, and Nothe following terms: Earnest deposit made as per this receipt	haser subj	ect to approval of sit shall be retur	ned to purchaser) forDollars	ober 1 1986
	Additional earnest deposit to be made by pure	elnafter f	xed (subject to no	NONE 1just 500,000.00	
ر	Deed or deeds of trust to be accepted by seller (Insert terms including type of loan, interest rate if any, and any special provisions.)				 lege, if any, commission,
	The sale under this contract shall be closed	under the	ugual SALE COL	NDITIONS AND CLOS	INC BRACTICES

and hereby made a part of this contract, as fully and effectually as if they were incorporated herein, at the office of Title Insurers Title Company, Clayton, Missouri

on November 1, 1986

or on such prior date as the parties hereto may agree.

All adjustments referred to on the reverse side hereof to be made as of CLOSING

Title to pass when sale is closed. Time is of the essence of this contract.

Possession of property to be delivered to purchaser at time of transfer of title, or on Closing

subject to any SPECIAL AGREEMENTS BETWEEN SELLER AND PURCHASER, all set forth on the reverse side hereof

Names of Tenants	Space Occupied	Lease Expires	Amount of Rent	When Due	Date Paid To

SALE CONDITIONS AND CLOSING PRACTICES

At election of either seller or purchaser, and at such purty's expense, sale may be closed in escrow department of the local office of any reputable title company, but terms of contract shall not be affected.

Earnest deposit to be retained by seller a agent, without interest, but agent shall not be liable for carnest deposit until actually in form of each in hands of agent; if sale is closed, carnest deposit to apply an eale commission; if purchaser shall fail to pay additional earnest deposit when due (if required by contract) or if sale be not closed by date fixed therefor owing to failure of performance by purchaser, earnest deposit shall be forfeited by purchaser, but purchaser shall nevertheless be bound to fulfillment of contract if so determined by seller, but this shall not entitle purchaser to enforce sale.

Forfeited carnest deposit shall go first toward reimburging expenses of agent incurred in this transaction, and balance to go one helf to seller and one helf to agent in full of commission.

Rents, general taxes based on latest available assessment and rate, subdivision upkeep assessments, interest, insur-Rents, general taxes based on latest available assessment and rate, subdivision upkeep assessments, interest, insurance premiums, water rates, sewer service charge, gas and electric bills, fuel supply and operating expenses (if any) to be prorated and adjusted as provided on the basis of 30 days to the month, seller to have last day; general tax year to run from January 1st; delinquent rents, over thirty days, if any, to be collected by seller and not adjusted. Purchaser to pay all recording fees, AND TRANSFER TAXES IF ANY

Seller shall furnish general warranty deed, subject to deed restrictions, easements, rights-of-way of record, and zoning regulations; also subject to leases and to occupancy of tenants existing on the date contract is executed by pur-

chaser; general taxes payable in current year and thereafter, and special taxes assessed or becoming a lien after date contract is executed by purchaser; said general and special taxes to be assumed and paid by purchaser. All personal property and fixtures included in this sale is guaranteed by seller to be paid for in full.

Title shall be marketable in fact, or purchaser will accept insurance policy issued by qualified title insurance company in lieu of strictly marketable title. If title is marketable, purchaser shall pay for certificate of title, it being understood that title charge includes the fee for services rendered by the agent, unless otherwise noted; if title is found imperfect and seller cannot perfect litle or obtain tille insurance policy as above provided within sixty days after date fixed for closing, earnest deposit shall be returned to purchaser and seller shall pay to agent the sale commission and other costs. incuding title charges. Seller shall pay for documentary stamps, if required by law.

If, after contract is executed, the premises be destroyed or damaged by fire, windstorm or otherwise, seller shall restore same within thirty days if possible and sale closing date shall be extended accordingly, but otherwise purchaser shall have option of cancelling or enforcing contract; if enforced, purchaser shall be entitled to insurance; if cancelled, earnest deposit shall be returned to purchaser. In either event agent shall receive full sale commission. Seller shall assume

risk of such destruction or damage and shall have the obligation to obtain consent of insurance companies to sale contract.

If improvements or additions have been completed within six months prior to sale closing date, seller shall furnish

reasonable security against mechanics' liens or satisfactory evidence of payment of bills.

Property to be accepted in its present condition unless otherwise stated in contract. Seller warrants that he has not received any written notification from any governmental agency requiring any repairs, replacements, or alterations to said premises which have not been satisfactorily made. This is the entire contract and neither party shall be bound by representation as to value or otherwise unless set forth in contract.

The words purchaser, seller, agent and deposit where appearing in this contract shall be construed in the plural, if

more than one.

This contract shall bind the heirs, legal representatives, successors and assigns of the parties hereto.

Contract assignable by purchaser, but not without consent of seller if purchase money deed of trust forms part of sale consideration.

Sale Commission: U of the total selling or exchange price on improved property and O on unimproved property; minimum charge

Special Agreements between Seller and Purchaser forming part of Contract:

- Purchaser has inspected the property and agrees to accept same in its AS IS condition.
- This sale excludes Seller's personal property and items of manufacturing equipment listed on Exhibit A, which items shall be removed from the property within a reasonable time after closing.
- Title shall be marketable, free and clear of all liens and encumbrances, subject to 3. easements, exceptions and other matters of public record. If Purchaser shall have an objection to title, he shall notify Seller in writing prior to closing and Seller may extend the time for closing for a reasonable period of time to clear such objections.
 - The Deed shall be in a form similar to that annexed hereto as Exhibit B.
 - Within 30 days of closing Purchaser shall remove all signs identifying Seller as

DEED

) Ехнівіт - В

This Deed is made on

, 19

BETWEEN

•	. •		
having its principal office at	a corporation c	of the state of	
AND			referred to as the Grantor.
AND			
whose post office address is			6 1
The word "Grantee" shall mean all G	rantees listed abov	/c.	referred to as the Grantee.
Transfer of Ownershlp. The described below to the Grantee. This	e Grantor grants transfer is made fo	and conveys or the sum of	(transfers ownership of) the property
		The Gran	ntor acknowledges receipt of this money.
	Lot No.	unicipality of ole on the da	Account No. te of this Deed. (Check box if applicable.)
Property. The property co-	nsists of the land c and State o	of	buildings and structures on the land in
			The legal description is:
property. This promise is called a '	"covenant as to gr clse to obtain any	antor's acts" / legal rights w	which affect the property (such as by making
Signatures. This Deed is date at the top of the first page. Its	signed and atteste corporate seal is	ed to by the G affixed.	Grantor's proper corporate officers as of the
Attested by:			
	Secretary	Ву:	President

STATE OF

COUNTY OF

SS.:

ST. LOUIS URETHANE MANUFACTURING EQUIPMENT

1 BELT DRIVE (36") CONVEYOR

1 PALLETIZER

] BAGGER

1 ROLL-OUT CONVEYOR

```
1 60-GAL. PUMP & MOTOR FOR POLYOL UNLOADING WITH 3" HOSE
 1 60-GAL. PUMP & MOTOR FOR ISO UNLOADING WITH 2" HOSE
 .4 ISOCYANATE STORAGE TANKS (15,000 GALS.)
 2 60-GAL. PUMP & MOTOR FOR ISO TRANSFER
 2 ISO COOLING/HEATING EXCHANGERS
 3 POLYOL STORAGE TANKS (15,000 GALS.)
 2 60-GAL. PUMP & MOTOR FOR POLYOL TRANSFER
 2 POLYOL COOLING/HEAT EXCHANGERS
 1 MIX TANK COMPLETE WITH SCALE & MIXER (3,000 GALS.)
 1 HOLD TANK WITH MIXER (3,000 GALS.)
 1 HOLD TANK WITH MIXER (3,000 GALS.)
. 1 ISO DAY TANK, NO MIXER (1,500 GALS.)
 4 HEAT EXCHANGERS (ALL FOUR TANKS LISTED ABOVE).
 1 SILICONE STORAGE TANK (6,000 GALS.)
 1 30-GAL. PUMP & MOTOR FOR SILICONE TRANSFER
 1 HEAT EXCHANGER
 1 FLAME RETARDANT TANK (5,000 GALS.)
  30-GAL. PUMP & MOTOR FOR FLAME RETARDANT TRANSFER
 2 HEATING & COOLING UNITS (5 TONS)
 1 AIR COMPRESSOR (15 H.P.)
 2 AIR COMPRESSORS (50 H.P.)
 2 AIR DRIERS
 1 PERLITE FEED CONVEYOR
 2 PERLITE LIFT TABLES
 2 FELT UNWIND STANDS (TOP & BOTTOM)
 2 5-TON HOIST LIFTS (MOVABLE)
1 PERLITE DUST COLLECTION-SYSTEM
1 PREHEAT CONVEYOR & HEATERS
I ISO P.T.R. TANK (200 GALS.) WITH SCALE
1 POLYOL P.T.R. TANK (200 GALS.) WITH SCALE
1 POLYOL PUMP & MOTOR (10 GALS.)
1 ISO PUMP & MOTOR (10 GALS.)
3 POLYOL BOSCH PUMPS WITH 30 H.P. MOTOR
 6 COMPLETE METERING UNITS FOR EACH STREAM
1 LAMINATOR (112 FEET) WITH HEATING SYSTEM & CONTROLS (50 H.P. DRIVE
  SYSTEM)
 2 SIDE TRIM SAWS (20 H.P.)
1 TRANSFER CONVEYOR
1 DUST COLLECTION SYSTEM FOR ALL SAWS
1 50 H.P. D.C. DRIVE CROSS CUT SAW
1 POWERED CONVEYOR SYSTEM (4 INCHES)
1 GANG SAW (12 FOOT) HYDRAULIC DRIVE SYSTEM
1 "V" BELT TRANSFER CONVEYOR
1 JUMP CONVEYOR (REVERSIBLE)
1 SECONDARY PALLETIZER & CONVEYOR
1 RUN-OUT ROLLER CONVEYOR
1 INCLINE BELT DRIVE (48" WIDE) CONVEYOR
1 ACCO BUNDLE STACKER
2 SMALL (6") BELT CONVEYORS
1 90 ANGLE POWERED CONVEYOR
1 PALLET DISPENSER
```

July 23, 1992

GAF Corporation 1361 Alps Road

Wayne, New Jersey 07470-3687

ATTN: Ron Soiefer

RE: Riverview Hall Industrial Properties

Dear Mr. Soiefer:

I have been advised by Mr. Wayne Weidemann of Riverview Industrial Center that we need to update GAF with respect to alleged de-stabilization of the asbestos waste pile located on the subdivided site. Enclosed for your information is a memorandum to File, drafted by Mr. Weidemann, that reflects contents of his meeting July 8, 1992 with representatives of Region VII EPA personnel. Also enclosed are historical memos from the United States EPA with reference to the site with respect to their past inspections.

It seems that at the present time that there may be some erosion of the secured asbestos cement pile by virtue of water running along a creek at the rear of the site.

We felt it necessary to inform you of the situation to bring you up-to-date with respect to the environmental activity. We will continue to pass information on to you as it is developed here in St. Louis. We do not believe that the de-stabilization is major at this point in time, but would appreciate your company looking into the situation as soon as possible. GAF Corporation July 23, 1992 Page Two

If you need any additional information, please do not hesitate to contact me.

Very truly yours,

Frank L. Pellegrini

FLP/sb

Fnc.

cc: Wayne Weidemann

Clark PROPERTIES

P.O. Box 189

Hazelwood (St. Louis County), Missouri 63042-0189

314/389-8822

(FAX) 314/389-1765

April 30, 1993

VIA FAX #201/628-3196

Mr. Ron M. Soiefer Attorney GAF/International Specialty Products 1361 Alps Road Wayne, New Jersey 07470

Re:

Former GAF Corp. Facility

9215 Riverview Blvd., St. Louis, Missouri

Dear Mr. Soiefer:

At the request of our attorney, Mr. Frank Pellegrini, I am enclosing a copy of the latest communication we have received from U.S. Environmental Protection Agency regarding the former GAF Corporation facility located at 9215 Riverview Blvd. in St. Louis, Missouri.

Should you have any questions or require additional information, please contact Mr. Pellegrini, 314/241-7445.

Sincerely,

Wayne E. Weidemann

WEW/sro Enclosure

cc: Frank L. Pellegrini



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII 726 MINNESOTA AVENUE KANSAS CITY, KANSAS 66101

APR 2 0 1993

<u>CERTIFIED MAIL</u> RETURN RECEIPT REQUESTED

HLC Properties, Inc.
d/b/a Clark Properties
c/o Harold L. Clark, Registered Agent
5391 Brown Avenue
Box 189
Hazelwood, Missouri 63042-0189

Dear Sir:

INFORMATION REQUEST

The United States Environmental Protection Agency, Region VII, ("EPA") is currently seeking information pertaining to the presence of hazardous substances, specifically asbestos, on or adjacent to the former GAF Corporation facility located at 9215 Riverview Blvd. in St. Louis, Missouri (the "Site").

Pursuant to the authority of Section 104 of the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. § 9604, as amended ("CERCLA"), you are hereby requested to respond to the Information Request set forth in Attachment A hereto.

Compliance with this Information Request is mandatory. Failure to respond fully and truthfully within thirty (30) days of receipt of this letter, or your failure to adequately justify such failure to respond, may result in enforcement action by EPA pursuant to Section 104(e) of CERCLA. This statute permits EPA to seek the imposition of penalties of up to twenty-five thousand dollars (\$25,000.00) for each day of continued non-compliance. The provision of false, fictitious or fraudulent statements or representations may subject you to criminal penalties pursuant to 18 U.S.C. § 1001.

This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501, et seq.

Please submit your response to this Information Request to:

David A. Hoefer, Assistant Regional Counsel
U.S. Environmental Protection Agency, Region VII
726 Minnesota Avenue
Kansas City, Kansas 66101

EPA strongly encourages you to give this matter your immediate attention and to respond to this Information Request within the time specified above. If you have any questions relating to this Information Request, you may consult with EPA prior to the time specified above. Please direct questions to Mr. Hoefer by calling (913) 551-7503.

Thank you for your cooperation in this matter.

Sincerely,

Robert L. Morby

Chief, Superfund Branch

ATTACHMENT A

INFORMATION REQUEST

INSTRUCTIONS

- 1. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, you must supplement your response to EPA. Moreover, should you find, at any time after the submission of your response, that any portion of the submitted information is false or misrepresents the truth, you must notify EPA of this fact as soon as possible and provide EPA with a corrected response.
- The information requested herein must be provided even though the Respondent may contend that it possibly includes confidential information or trade secrets. You may, if you desire, assert a confidentiality claim covering part or all of the information requested pursuant to Sections 104(e)(7)(E) and (F) of CERCLA, 42 U.S.C. §§ 9604(e)(7)(E) and (F), and 40 C.F.R. § 2.203(b) by attaching to such information at the time it is submitted, a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Information covered by such a claim will be disclosed by EPA only to the extent, and only by means of the procedures set forth in statutes and regulation set forth above. If no such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to you. You should read the above-cited statute and regulation carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this Attachment A:

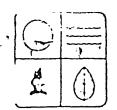
- 1. The term "you" or "Respondent" means HLC Properties, Inc., a Missouri corporation doing business as Clark Properties, and officers, employees, agents, subsidiaries, predecessors, successors, and assigns of HLC Properties, Inc. and Clark Properties.
- 2. The term "Site" means the former GAF Corporation facility located at 9215 Riverview Blvd. in St. Louis, Missouri, which is now owned by Clark Properties.
- 3. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business address and business telephone number, present or last

known home address and home telephone number, and present or last known job title, position or business. The term "identify" means, with respect to a document, to provide its customary business description, its date, its number if any (invoice or purchase order number), the identity of the author, addressor, addressee and/or recipient, and the substance or the subject matter. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA or 40 C.F.R. Part 300, in which case the statutory or regulatory definitions shall apply. QUESTIONS Identify all persons consulted, and all documents reviewed in the preparation of responses to this Information Request. Identify all persons, including Respondent's employees, who have knowledge, information or documents pertaining to the generation, use, treatment, storage, disposal or other handling of hazardous substances at the Site. Describe the nature of your activities at the Site, particularly with respect to the processing, storage, treatment, disposal, or other handling of asbestos or asbestos containing material ("ACM"). Identify who you acquired the Site from. In addition, identify the time periods during which you operated and/or owned the Site. Identify any persons who operated at the Site during the time that you owned the Site. In addition, identify the activities they conducted at the Site, the time periods they operated at the Site, and the interest they held in the Site during the period of operation. 6. Identify all solid waste units (e.g., waste piles and landfills) located at the Site during the period that you owned/operated the Site. For each unit identified, provide the following information: a. The type and dimensions of the unit; The dates that the unit was in use; The quantity and types of materials placed in the c. unit; The construction of the unit; d. - 2 -

e. How the unit was closed and what actions were taken to prevent or address potential or actual releases of asbestos or ACM from the unit; and

f. If available, provide a map showing the unit's boundaries and the location of all known solid waste units.

- 7. At the time that you acquired the Site, did you know or have reason to know that any hazardous substance was located at, or disposed of on the Site? Describe all investigations of the Site you undertook prior to acquiring the Site and all of the facts on which you base the answer to this question.
- 8. Have you at any time since you acquired the Site performed any investigations of the soil, water (ground or surface), geology, hydrology, or air quality on or about the Site? If so, what were the results? Provide copies of all reports, etc., pertaining to such investigations.
- 9. Have you at any time performed any removal or remedial activities with regard to hazardous substances at the Site? If so, provide copies of all documents, reports, etc., pertaining to such activities.
- 10. Identify the acts or omissions of any persons, other than your employees, contractors, or agents, that may have caused the release or threat of release of asbestos or ACM at or from the Site.
- 11. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any question contained herein or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.
- 12. For every question contained herein, if information or documents responsive to this Information Request are not in your possession, custody or control, then identify the persons from whom such information or documents may be obtained.



3.600 St. Lauf County
GAT- :tninteec ompany Ashestos Dump L

June 2, 1980

Mr. John P. McGinley Vice President, Manufacturing A-C Pipe Division Certainteed Corporation P.O. Box 860 Valley Forge, PA 19482

Dear Mr. McGinley:

This is to advise that we have completed our staff review of the project to stabilize the asbestos waste pile located at the Certainteed Corporation plant site in St. Louis County, Missouri.

The results of our latest inspection of the site conducted on May 13, 1980 confirm that the project has been completed in basic conformance with the approved plans and specifications as prepared by the consultant, Reitz & Jens, Inc. The inspector was satisfied that the necessary work has been accomplished in terms of the specified grading, covering and vegetative growth establishment provisions, as well as installation of the stream bank rip-rap and strom water drainage appurtenances. Verification of the closure plat to be filed with the County Recorder of Deeds Office has also been received in this office.

Book 17 P37

Based upon these determinations, it is our judgement that the Certainteed Corporation has taken the necessary actions to stabilize the asbestos waste pile and thereby restore the site to a condition in which it no longer poses a threat of contamination to the water or air resources of the state.

We again thank Certainteed Corporation personnel for their cooperation in resolving this matter in good order.

Sincerely,

Earl F. Holtgraewe, P.E.

Regional Administrator
St. Louis Regional Office

Department of Natural Resources

EFH/MD/dak

CC: Reitz & Jens, Inc.

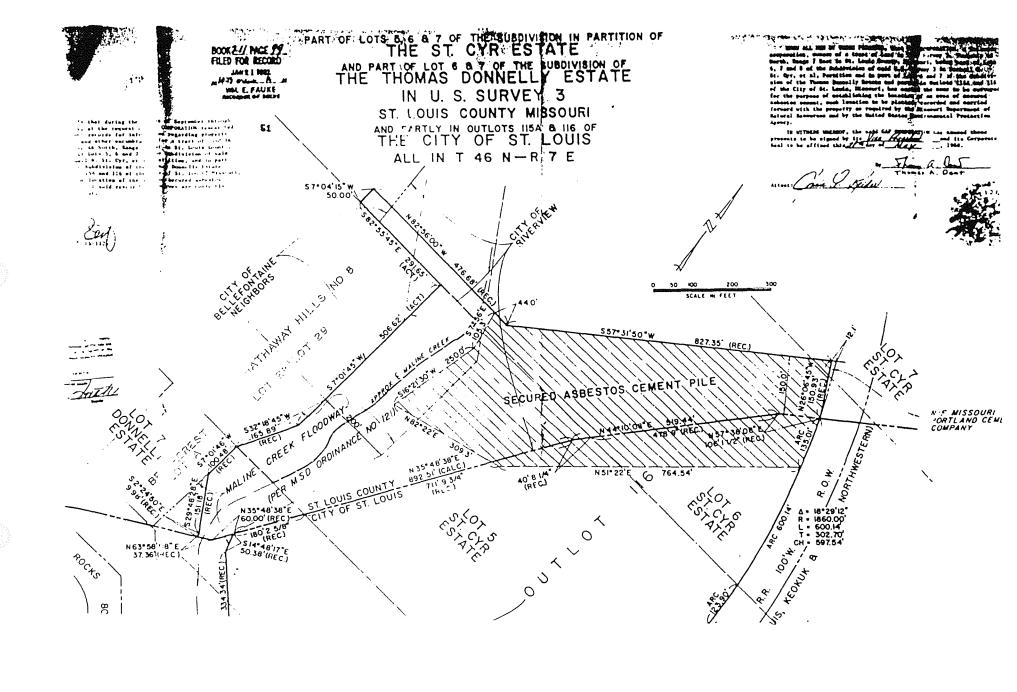
Environmental Protection Agency, Pegior VII Metropolitan St. Louis Sever District

Central Office, Solid Waste Management Program

Joseph P. Teasdale Governor Fred A. Latser Director St Louis Regional Office

cT. Lower

ACHON .	POTENTIAL	HAZARDOUS WAS	TE SITE		н.	OH SITE	HUMBER				
SOLIM	TENTATIVE DISPOSITION					VII MOD980631162					
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C. REMEDIAL ACTION NEEDED (II	yea, complete Sac	tion [V+)	•			::					
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H. PREPARER INFORMATION											
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Steven Kinser			913-236-2856 1-3-86								
A. IDENTIFY ADDITIONAL INFORMA		NVESTIGATIVE A									
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none see above.				·	* •	•					
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B. PROPOSED INVESTIGATIVE ACT	TIVITY (Decelled)	'nlametian)		1							
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7 25 FUNSTON ROAD KANSAS CITY, KANSAS 66115

JUN 3 0 1988

MEMORANDUM

SUBJECT: GAF Transite Plant, St. Louis, Missouri

(SBR60)

FROM:

Paul E. Beatty Le &

Environmental Engineer, AMON/EMCM/ENSV

TO:

Charles Whitmore

Chief, Air Compliance Section, ARBR/ARTX

THRU:

Joe Arello

Acting Chief, Air Monitoring Section, EMCM/ENSV

ATTN:

Joann Heiman

Air Compliance Section, ARBR/ARTX

At the request of the Air and Toxics Division (ARTX), the Environmental Monitoring and Compliance Branch (EMCM), Air Monitoring Section conducted an inspection at the old GAF Transite manufacturing facility in St. Louis, Missouri on June 15, 1988. The purpose of the inspection was to determine the amount and condition of the exposed asbestos-containing Transite, buried and abandoned on the property.

In 1979, Transite production at the facility stopped. The large waste pile north of the plant was graded and covered with soil. The edge of the waste dump next to Maline Creek had been stabilized with rock.

The property is currently owned by Harold Clark, 464 Summit, St. Louis, Missouri. Upon arrival at the site, I spoke with Brad Harris of Riverview Industrial Services, 9215 Riverview, St. Louis, Missouri, which leases space in the old GAF building. I explained the purpose and scope of the inspection. The adjoining property, the old Certain-Teed Transite pipe plant, was inspected on 5/25/88. For site information, please refer to the attached site maps (Attachment 1).

During the inspection, the covered waste pile, while Creek bank and general plant site area were inspected for Transite. The waste pile area was covered with dirt and grass and appeared to be stable. No Transite was visible except in a small area of top of the pile.

ich Lego Arba Series Clar Ke. That area contained approximately 20 small pieces, and sample SBR60-002 was collected there. The material is cementious, but when rubbed with the fingers, a powder is seen on the fingers.

Along the creek bank, some erosion has taken place and some Transite board is visible. Along the treelined creek bank, west of the main building, recent grading has taken place, exposing a lot of Transite board. The graded area contains pieces of Transite. Transite pieces were also exposed along the creek bank. The graveled area at the edge of the southwest parking lot also contained a large amount of Transite pieces. Sample SBR60-004 was taken from this area.

The dirt south of the service road has been graded and graveled, and is used as a storage area. Mr. Harris said it was constructed 2 to 3 months ago by Clayco Construction Company, which is also owned by Harold Clark. Along the edge of the graveled lot and the covered waste dump are numerous pieces of Transite. Sample SBR60-003 was obtained from this area. Mr. Harris said that a fence will be built between the waste dump and graveled lot areas.

Overall, a lot of exposed Transite is at the site. No visible emissions were observed during the inspection, but the potential for fiber release increases as the Transite weathers or is broken up by truck traffic or site grading.

For additional sampling information, please refer to the attached sample analysis (Attachment 2), sample summary sheet (Attachment 3) and the chain-of-custody sheet (Attachment 4). The photographs are forthcoming.

Attachments

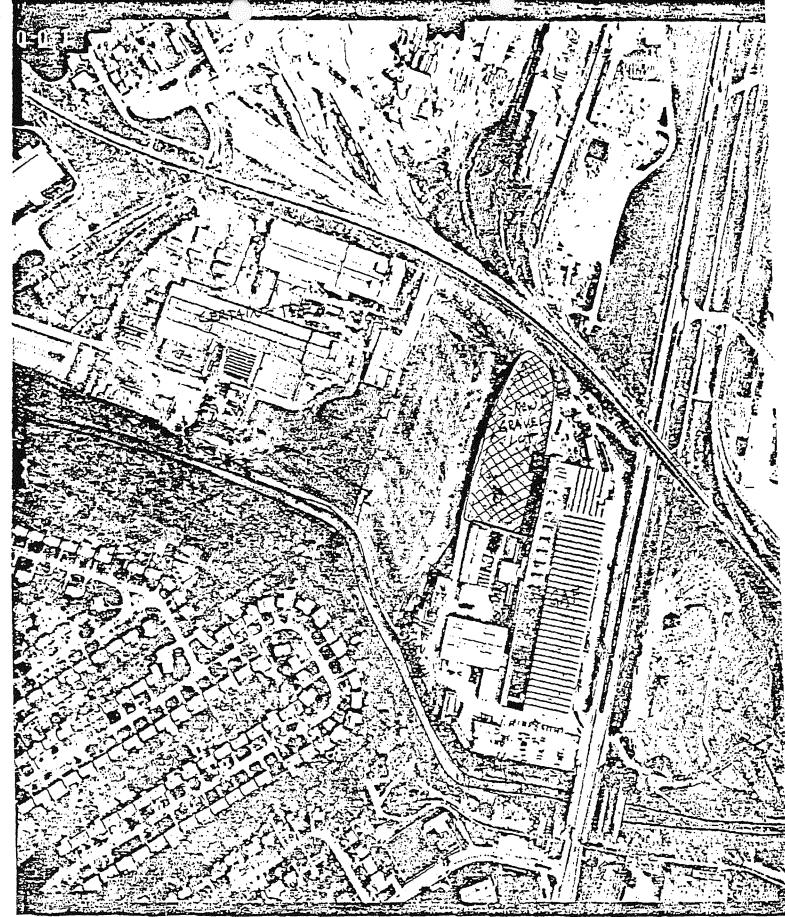
- .1. Site Maps
- 2. Sample Analysis
- 3. Sample Summary Sheet
- 4. Chain-of-Custody Sheet

INSPECTION REPORT RECEIPT AND FOLLOW-UP SHEET

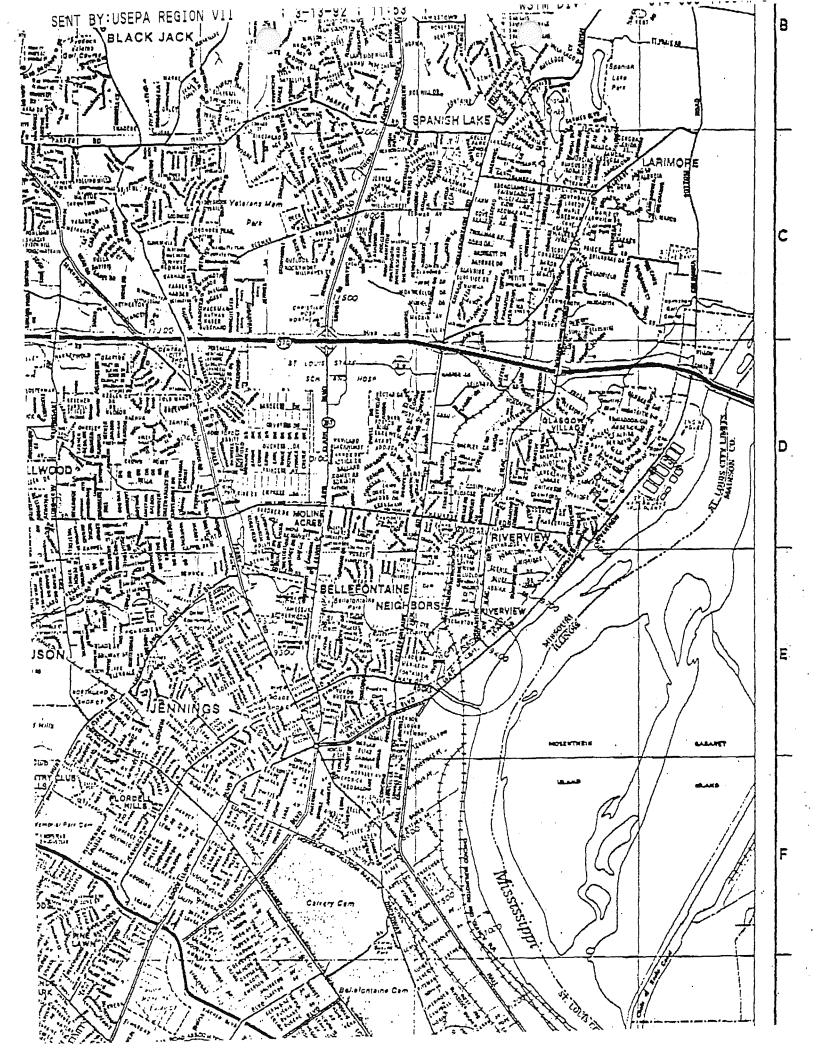
* Inspector: PAUL BEATTY	•
* Facility Name: GAF WASTE DUMP	
* Facility Location: ST. LOUIS, MO	
* Date of Inspection: 6/15/88	<u>,</u> :
* Activity No.: 5BR60	•
* Date Report Transmitted: / /	
Date Report Received: / / Additional Information Needed/Requested Not Included In Repor	•
* No. Samples Taken: 4 No. Sam Disposition [Retain, Discard, Analyze More (Specify Which)]:	nples Analyzed: 👉
* Field Notes Taped [Yes/No]: Disposition [Retain, Discard, Transcribe]:	•
* No. Photographs Taken: No. Ph Additional Copies Needed (Specify Which):	otographs In Report: (
Additional Information Needed By: / /	
Report Reviewed By: Date Review Completed: / /	

All other information to be completed by Air Compliance Section and returned to Environmental Evaluation Section.

^{*} To be completed by inspector.



4070 74740 105079



ANALYGIC OF BULK INSULATION FOR ASBESTOC EPA REGION VIT INORGANIC DATA

TITLE: GAT WASTE DUMP

DATE: DG/23/80

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CHAIN OF CUSTODY RECORD NVIRONMENTAL PROTECTION AGENCY REGION

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Riverview Environmental

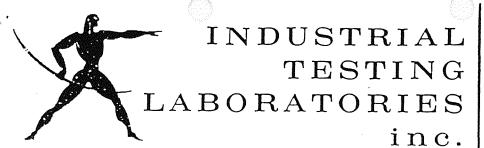
Soil test reposit

For back Sil area

around total

caderground tanks





2350 Seventh Blvd.

St. Louis, Missouri 63104

Chemists

Engineers

Metallurgists

314/771-7111

Report No. 88-06-5203

June 28, 1988

P.O. #: 9596

Determination of fiber content on three (3) bulk insulation samples submitted.

Clayco Construction Company 462 Summit Avenue St. Louis, MO 63042

Attn:

Mr. Mike Pinson

Test Report

Sample Identification I.T	C.L. No.	<u>Fiber</u> C	ontent
#1 500 gal gas tank at Entrover 1	16727 1-	3% asbesto	s, chrysotile
#2 zox got Red ail renk at 1 leading dock (No took existing)		10% asbesto	s, chrysotile
		10% asbesto	s, chrysotile
at built herse to be removed			

Samples with concentrations reported as 1-3% asbestos or greater have been evaluated as positive and therefore, by EPA definition, are asbestos containing materials (ACM).

Industrial Testing Laboratories is accredited by the United States Environmental Protection Agency for the analysis of asbestos in bulk samples. (No. 7355)

Tests were performed using Polarized Light Microscopy and Dispersion Staining in accordance with "Interim Method for the Determination of Asbestos in Bulk Insulation Samples", EPA-600/M4-82-020.

Respectfully submitted,

William J. Lowry, Manager

Environmental Lab

Lab No. 116727-116729 L.B. 27990 JK/bc

Inv. # 21696

Riverview
Envronmental

Jacker ground tank Content test results



Metropolitan St. Louis Sewer District

Department of Environmental Compilance 10 East Grand Avenue St. Louis, MO 63147-2913 (314) 436-8710

June 28, 1988

Mr. Mike Pinson CLAYCO CONSTRUCTION COMPANY 462 Summit Avenue Hazelwood, MO 63042

Dear Mr. Pinson:

Please find enclosed a copy of the laboratory results from the sample of waste water which you submitted June 20, 1988. The only parameter that is over the limits for discharge to the MSD is iron. The iron concentration found was 100.8 mg/l and the discharge limit is 15 mg/l. Therefore the wastewater would have to be discharged with a large volume of other sanitary waste in order to meet the MSD discharge limits.

If you have any additional questions please call me at 436-8714.

Sincerely,

METROPOLITAN ST. LOUIS SEWER DISTRICT

John R. Lodderhose, P.E.

Manager, Environmental Compliance

jsf

Enclosure

LIMITED SAMPLE

MSD Industrial Waste Laboratory Special Sample Form

Lab. No	□ Comp □ Grab	Date Received	1/55
Sample Date	Sample Time	•	to
Requested by:	· · Colle	ected by: Military	· · · · · ·
Sample Source:		Truck No	1-9181
Sampling Location:	16 75/2/	VCC TIME	
Reason for sample:	7 111 If	- wife (· · · · · · · · · · · · · · · · · · ·
☐ Trunk ☐ Sanitary ☐	Stream	□ Seepage □ ST	P 🛘 Hauler
Other (explain)			
Analysis: except	□ ug/L □ mg/kg	□ % comp □ oth	er
pH <u>(c. 8</u> (units)	O F	☐ Hg	
☐ SPC(umhos/	/cm)		-
□ ALK	□ CN		
□ ACI	□ CNA	Be	
□ TS	□ KJN		<u> 2162. </u>
□ ss	□ NH ₃		((')_
□ vss	□ NO ₃	Þ Cu	<u> </u>
□ %V	□ NO ₂	Fe	_/(i, S
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Appearance:	THE WELL SELLENG		4 363
	LEL ARAD UV	☐ FLUOR / ID ∠	(KUT FIDEL)
☐ Biological: ☐ Coliform:	☐ Total:		No./100ml No./100ml
☐ Microscopic: ☐ Bioassay:	☐ Fecal Strep:		No./100ml
		MEFT - MINES	
	<u> </u>		
Date	e Transmitted:	/ hv	

MSD Industrial Waste Laboratory INSTRUMENTATION ANALYSES

	NSTRUMENTATIO		NALYSES		2 1 00
Lab. No. 4365 1- Sample Source:	GAF BLDG	۵.		Da	te Received 6 9188
Sample Date Time:		⊐ G	rab 🗆 Comp	o Coll	ected by:
GO LEL RAD UV	☐ FLUOR ☐	TLC	0		
☐ Priority Pollutant mg/L	(except as noted)				BASE/NEUTRALS: (Cont'd)
VOLATILES: 101, 30 2 (N) acrolein acrylonitrile benzene bromodichloromethane bromodichloromethane bromodichloromethane bromodichloromethane carbon tetrachloride chlorobenzene chloroethane 2-chloroethyl vinyl ether chloroform chloromethane dibromochloromethane 1,2-dichlorobenzene 1,3-dichlorobenzene 1,1-dichloroethane 1,2-dichloroethane 1,2-dichloroethane 1,2-dichloropropene 1,3-dichloropropene	ACIDS: (Cont'd) 2.4-dinitrophenol 2-nitrophenol 4-nitrophenol 4-nitrophenol 4-nitrophenol pentachiorophenol phenol 2.4.6-trichiorophenol phenol 2.4.6-trichiorophenol BASE/NEUTRALS acenaphthene acenaphthene acenaphthene anthracene benzo(a)anthracene benzo(a)pyrene benzo (b) fluoranthene benzo (c), i) perylene benzo (k) fluoranthene benzo (k) fluoranthene bis (2-chloroethoxy) methi bis (2-chloroethoxy) methi bis (2-chloroethoxy) phthalate 4-chlorophenyl phenyl ether butyl benzyl phthalate 2-chlorophenyl phenyl ether chrysene dibenzo (a,h) anthracene 3,3-dichlorobenzidine diethyl phthalate din-noctyl phthalate din-noctyl phthalate din-noctyl phthalate din-noctyl phthalate 2,4-dinitrotoliuene	ane er 8			hexachlorocyclopentadiene hexachlorocyclopentadiene indeno (1,2,3-cd) pyrene isophorone naphthalene nitrobenzene N-nitrosodimethylamine N-nitrosodiphenylamine N-nitrosodiphenylamine phenanthrene pyrene 2,3,7,8-tetrachlorodibenzo-p-dioxin 1,2,4-trichlorobenzene PESTICIDES: aldrin alpha-BHC beta-BHC qamma-BHC detta-BHC chlordane 4,4-DDD dieldrin dieldrin alpha-endosulfan beta-endosulfan beta-endosulfan endousulfan sulfate endrin endrin aldehyde heptachlor PCB-1016 PCB-1021
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2.4-dimethylphenol 4. 6-dinitro-2-methylphenol	hexachlorobenzene hexachlorobutadiene				PCB-1260 toxaphene
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☐ Infrared Spectroscopy (a) methods utilized	_				
(b) results:			API Gravity:		
☐ Ultraviolet/Visible Spectroscopy results:					
☐ Special Tests: (specify)					
Conclusions	- Learning				
Date:	Transmitted: */				h.,

64-130WW



Clayton Chemical Co.

Y		SBC FOR LABORATI	ORY REPORT SHEET	•
Sample from	Clayo	0	•	Date
Sample Name	Waste	Oil		Submitted by Dave
Company Name	Clayo	0		
Company Address	s s 462 S	ummitt Ave.; St. Louis	, MO 63042	Roopen
Contact Name		Penson	, -	Beeper Phon e # 314-731-8181/554-1570
Type of Solvent	Waste	.0il	Contaminants	BS&W
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July 11, 1988

22/2/24

Mr. Alan Barton
Thompson & Mitchell
Attorney at Law
1 Mercantile Center
St. Louis
MO 63101

Dear Mr. Barton:

RE: Riverview Industrial Center - Clark Properties

I would like to update you as to the current status of the underground storage tank investigations at the Riverview Industrial Center.

The following steps have been taken:

- 1. The four sites of possible underground storage have been excavated.
- 2. Two tanks have been found: the 16,744 gallon tank in front of the office entrance and the 10,000 gallon tank located near the former site of Bldg. 18.
- 3. Samples of the contents of both tanks were collected and submitted for analysis by Mr. Mike Pinson of Clayco Construction. The water-like sample from the 16,744 gallon tank was submitted to the Metropolitan St. Louis Sewer District. The oil sample form the 10,000 gallon tank was submitted to Clayton Chemical of Sauget, Illinois, for review. Mr. Pinson has received analytical results and will be forwarding them to our office shortly.
- 4. Upon excavation of the past and present tank locations an asbestoslike material was observed in the soil. This material was submitted for analysis by Clayco Construction and according to Mr. Pinson the results do show a small amount of friable asbestos present. These test results also are being forwarded to our office.

Mr. Alan Barton July 11, 1988 Page 2

The State of Missouri and the City of St. Louis do not require the removal of the asbestos. However, if it is left in the ground the provisions of 10 CSR 80-2.030 require that the locations of the asbestos be noted on the title or deed of the property. If the asbestos is removed the state must be notified twenty days in advance. In addition, the state may require that an approved asbestos contractor do the work or at least act as an inspector of the operations. All asbestos removed must be properly containerized and labelled. The above mentioned removal requirements apply even if the asbestos is moved to the asbestos pile behind the facility.

The work remaining to be completed includes the decommissioning removal and disposal of the 10,000 gallon tank and the decommissioning of the 16,744 gallon tank. The larger tank is situated very near a foundation of the warehouse and its removal may jeopardize the integrity of the building.

If you have any questions regarding these matters, please contact me.

Sincerely,

METCALF AND ASSOCIATES

Karen D. Acker

Environmental Engineer

KDA/bie

cc: Joseph Ambrose, Mercantile Bank

Harold Clark, Clark Properties



June 13, 1988

Riverview / Environmental

Mr. Alan Barton Thompson & Mitchell Attorneys at Law 1 Mercantile Center St. Louis, MO 63301

RE: Riverview Industrial Center, Clark Properties

Dear Mr. Barton:

Please find enclosed the site blueprint for the Riverview Industrial Center at 9215 Riverview Dr., St. Louis, MO, formerly owned by GAF. The locations of four underground storage tanks, as indicated by the blueprint, have been highlighted in yellow. In addition to the underground tanks, an above ground tank is also shown, however it has been removed according to Mr. Harold Clark of Clark Properties.

Regarding the asbestos waste pile located at the site, Missouri Department of Natural Resources (MoDNR) considers the pile to be stabilized. Mr. Dan Bennett of the St. Louis Regional office of MoDNR stated that no action was pending.

MoDNR was also contacted concerning compliance with the Resource Conservation and Recovery Act. Mr. Tom Judge of the Enforcement Division at the Jefferson City office stated that the MoDNR currently has no enforcement action pending in regards to the Riverview Industrial Center.

Please contact me should you have any further questions in this matter.

Sincerely,

METCALF AND ASSOCIATES

Karen Acker

Environmental Engineer

KA/jy

Encl.

cc: Mr. Joe Ambrose, Mercantile √ Harold Clark

1/Le

June 1, 1988

Mr. Alan Barton Thompson & Mitchell Attorneys at Law 1 Mercantile Center St. Louis, MO 63101

Dear Mr. Barton:

Please find enclosed the results of an Environmental Review of the Riverview Industrial Center performed by Metcalf and Associates on May 27, 1988.

If you have any questions regarding this matter, please contact me.

Sincerely,

METCALF AND ASSOCIATES

C. L. Metcalf President

CLM/bje

Encl.

cc: Mr. Harold Clark Mr. Pat Stevenson

HLE

ENVIRONMENTAL REVIEW

RIVERVIEW INDUSTRIAL CENTER 9215 RIVERVIEW DRIVE ST. LOUIS, MO

> Metcalf and Associates 217 N. Second Street St. Charles, MO 63301 314-946-4499

PROPERTY DESCRIPTION:

Riverview Industrial Center

LOCATION:

9215 Riverview Drive

St. Louis, MO

FACILITY CONTACTS:

Harold Clark, Chairman, Clark Properties

Mathew B. Librach, President, Clark Properties

(314) 895-4393

SUMMARY:

On May 27, 1988, the Riverview Industrial Center was reviewed for areas of environmental concern by Mr. Cliff Metcalf of Metcalf and Associates. Also in attendance were Mr. Harold Clark and Mr. Mathew B. Librach, both of Clark Properties.

SCOPE:

A general walkthrough of the building and surrounding property was conducted to identify possible environmental problem areas. No sampling or metal detection work was performed due to the limited time frame allowed for this project.

FINDINGS:

The following items were noted during the review of the building and property:

1. Insulating Material - Eliminator Line

A blown-on insulating material was found around the skylight and on the upper walls of the Eliminator Line. This material was analyzed for the presence of asbestos by Microscopic Analysis, Inc., St. Louis, MO on January 20, 1987. No asbestos was detected.

2. PCB Transformer

A PCB contaminated transformer is on the property but will be flushed and removed on June 8, 1988, by U. S. Pollution Control, Inc. of Oklahoma City, OK.

3. Containers of Chemicals

A number of containers of chemicals currently being reviewed for disposal were observed on site. The inventory is as follows:

<u>Container</u>	Substance
1 each 55-Gallon - Plastic	Unknown - possibly Chromic Acid or Oil
l each 55-Gallon - Metal	Velocite Oil, E467
l each 30-Gallon - Metal	Unknown
1 each 5-Gallon - Metal	Mondure 489, G489-4-604

Unknown

Clark Properties personnel are presently arranging for the off-site treatment and/or disposal of these containers.

4. Above-ground Tank

8 each Small Containers

An above-ground tank used for fuel storage has been removed. According to Mr. Clark and Mr. Librach, the piping for this tank was all above ground. The potential for contamination due to the tank is unknown and would depend on what contaminants, if any, were present and if any spillage occurred.

5. Transite Siding

A large area of the building exterior is covered with transite siding. Transite is an asbestos material which is not friable unless broken or otherwise damaged. The transite is in the process of being covered with corrugated metal siding.

6. <u>Underground Storage Tanks</u>

According to Mr. Fred Bright of GAF of Wayne, New Jersey, four underground storage tanks were in use at the Riverview facility when it was under GAF ownership. The tanks are as follows:

Tank #	Volume <u>(Gallon)</u>	Substance Stored
1	10,000	Fuel Oil
2	16,000	Fuel Oil
3	500	Gasoline
4	2,000	Fuel Oil

Only Tank #1 can be confirmed as to its continued existence at the facility. A map of tank locations is being forwarded by GAF, but will not be received in time to submit with this report.

CONCLUSION:

Of the environmental concerns noted by Metcalf and Associates during the facility walkthrough, several are being dealt with in the immediate future. The PCB transformer and the chemical containers will be disposed of this summer. The transite siding is presently being covered and sealed with metal siding. In the matter of the underground storage tanks, it is recommended that more detailed information be obtained from GAF regarding the decommissioning of the tanks.

Mercantile Bank N.A.
North County Regional Cerur

2885 Netherton Drive St. Louis, MO 63136 314-741-9100



June 10, 1988

Frank L. Pellegrinni

C/O Harold Clark

464 Summit Avenue

St. Louis, Mo 63042

RE: Metcalf & Associates Review

Riverview-Hall Industrial Center

Dear Mr. Pellegrinni:

Enclosed is the Environmental Review of Riverview-Hall Industrial Center performed by Metcalf & Associates which you had requested.

If you have any questions, please contact any of the involved parties.

Sincerely,

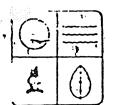
Joseph T. Ambrose

Assistant Vice President

JTA/dmh Enclosures

cc: Credit File

July 19, 1988 Mr. Jim Watts Village of Riverview 9699 Lilac St. Louis, Missouri 63137 RIVERVIEW HALL INDUSTRIAL PROPERTIES SUBDIVISION APPROVAL REQUEST Dear Jim: First of all, thank you for the many courtesies and hospitality shown to me Monday night at the informal meeting in the above captioned request. We want you to know that we appreciate it very much. Per our conversation, please find enclosed the applicable EPA material which we have received as purchasers of the property through GAF Corporation. If any further information or documentation is needed, please do not hesitate to contact me. As I indicated at the meeting, the site is surveyed periodically by the Missouri DNR and the most recent inspection has occurred by the Missouri DNR. We would appreciate being advised on dates for public hearings where our appearance would be required. Again, if any other information is required, please do not hesitate to call. Best regards, Frank L. Pellegrini FLP/db Enclosure



June 2, 1980

Mr. John P. McGinley Vice President, Manufacturing, A-C Pipe Division Certainteed Corporation P.O. Box 860 Valley Forge, PA 19482

Dear Mr. McGinley:

This is to advise that we have completed our staff review of the project to stabilize the asbestos waste pile located at the Certainteed Corporation plant site in St. Louis County, Missouri.

The results of our latest inspection of the site conducted on May 13, 1980 confirm that the project has been completed in basic conformance with the approved plans and specifications as prepared by the consultant, Reitz & Jens, Inc. The inspector was satisfied that the necessary work has been accomplished in terms of the specified grading, covering and vegetative growth establishment provisions, as well as installation of the stream bank rip-rap and strom water drainage appurtenances. Verification of the closure plat to be filed with the County Recorder of Deeds Office has also been received in this office.

Based upon these determinations, it is our judgement that the Certainteed Corporation has taken the necessary actions to stabilize the ashestos waste pile and thereby restore the site to a condition in which it no longer poses a threat of contamination to the water or air resources of the state.

We again thank Certainteed Corporation personnel for their cooperation in resolving this matter in good order.

Sincerely,

Earl F. Holtgraeve, P.E.

Regional Administrator St. Louis Regional Office

Department of Natural Resources

EFH/MD/dak

CC: Reitz & Jens. Inc.

Environmental Protection Agency, Pegior VII

Metropolitan St. Louis Sewer District

Central Office, Solid Waste Management Program

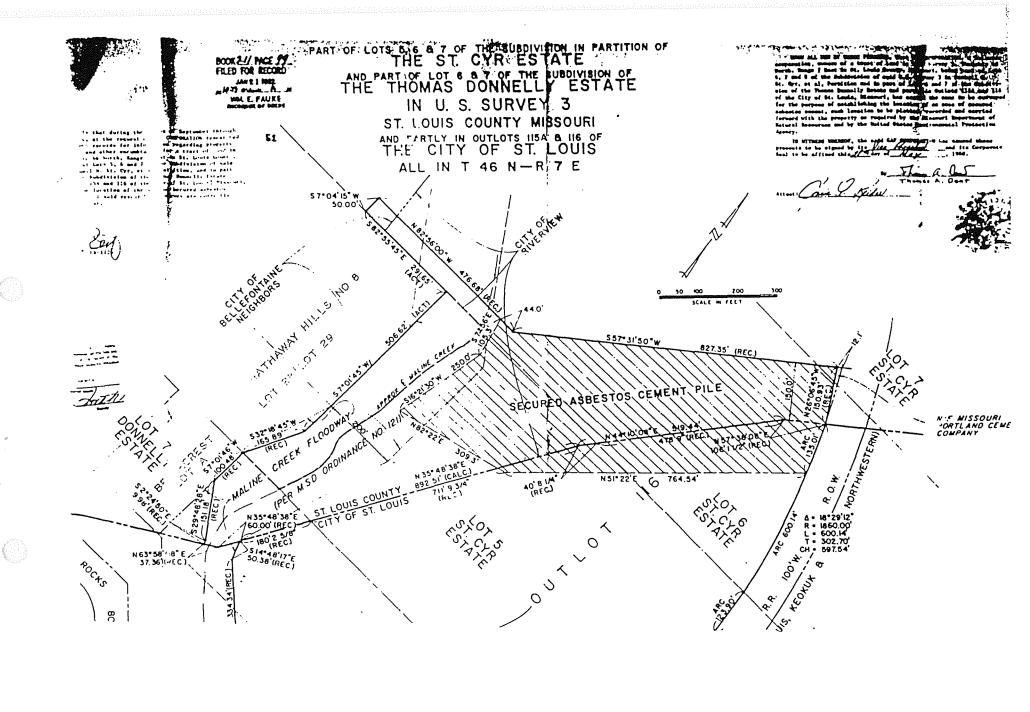
Joseph P. Teasdale Governor

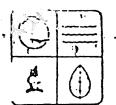
Fred A. Laiser Director

St. Louis Regional Office

ct. Lows

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TENTATIVE DISPOSITION					VII MOD980631162			
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A. SITE NAME			B. STREET					
Cartainteed Products Corp.			600 St. Cyr Rd.					
St. Louis								
St. Louis	Mo. 63137							
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3.600 St. Louis County :
GAF- :tninte Company Ashes tos Dump |

June 2, 1980

Mr. John P. McGinley Vice President, Manufacturing, A-C Pipe Division Certainteed Corporation P.O. Box 860 Valley Forge, PA 19482

Dear Mr. McGinley:

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The results of our latest inspection of the site conducted on May 13, 1980 confirm that the project has been completed in basic conformance with the approved plans and specifications as prepared by the consultant, Reitz & Jens, Inc. The inspector was satisfied that the necessary work has been accomplished in terms of the specified grading, covering and vegetative growth establishment provisions, as well as installation of the stream bank rip-rap and strom water drainage appurtenances. Verification of the closure plat to be filed with the County Recorder of Deeds Office has also been received in this office.

Based upon these determinations, it is our judgement that the Certainteed Corporation has taken the necessary actions to stabilize the ashestos waste pile and thereby restore the site to a condition in which it no longer poses a threat of contamination to the water or air resources of the state.

We again thank Certainteed Corporation personnel for their cooperation in resolving this matter in good order.

Sincerely,

Earl F. Holtgraewe, P.E.

Regional Administrator
St. Louis Regional Office

Department of Natural Resources

EFH/MD/dak

CC: Reitz & Jens. Inc.

Environmental Protection Agency, Pegior VII Metropolitan St. Louis Sever District

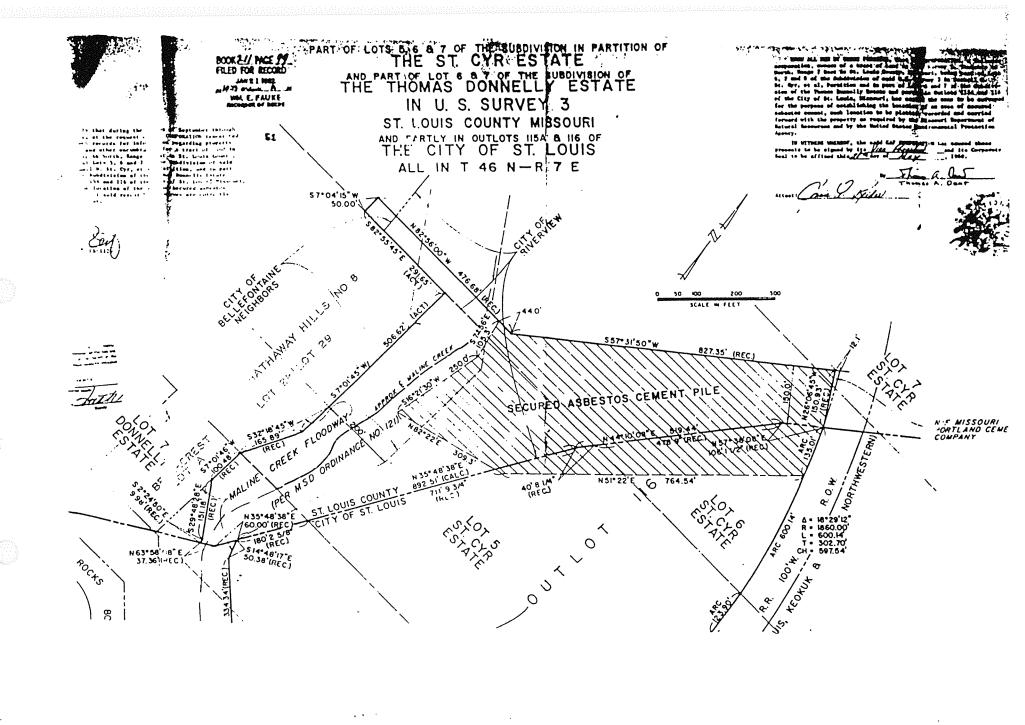
Central Office, Solid Waste Management Program

Joseph P. Teasdale Governor

Fred A. Latser Director St Louis Regional Office

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File this form in the regional Hazardous Waste Log File and submit a copy to: U.S. Environmental Protection Agency; Site Tracking System; Hazardous Waste Enforcement Task Force (EN-335); 401 M St., SW; Washington, DC 20460.									
·		I. SITE IDENTI	FICATION						
A. SITE HAME			B. STREET						
Cartainteed Products Corp.			600 St. Cyr Rd.						
C. CITY			D. STATE			E. ZIP CO	DΕ		
St. Louis			Mo.		• •	· · 6	3137		
II, TENTATIVE DISPOSITION									
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RECOMMENDATION						ACTION AGENCY			
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and File copy

June 13, 1988

Mr. Alan Barton Thompson & Mitchell Attorneys at Law 1 Mercantile Center St. Louis, MO 63301

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RE: Riverview Industrial Center, Clark Properties

Dear Mr. Barton:

Please find enclosed the site blueprint for the Riverview Industrial Center at 9215 Riverview Dr., St. Louis, MO, formerly owned by GAF. The locations of four underground storage tanks, as indicated by the blueprint, have been highlighted in yellow. In addition to the underground tanks, an above ground tank is also shown, however it has been removed according to Mr. Harold Clark of Clark Properties.

Regarding the asbestos waste pile located at the site, Missouri Department of Natural Resources (MoDNR) considers the pile to be stabilized. Mr. Dan Bennett of the St. Louis Regional office of MoDNR stated that no action was pending.

MoDNR was also contacted concerning compliance with the Resource Conservation and Recovery Act. Mr. Tom Judge of the Enforcement Division at the Jefferson City office stated that the MoDNR currently has no enforcement action pending in regards to the Riverview Industrial Center.

Please contact me should you have any further questions in this matter.

Sincerely,

METCALF AND ASSOCIATES

Karen Acker

Environmental Engineer

KA/iy

Encl.

cc: Mr. Joe Ambrose, Mercantile

4 Harold Clark

121-2:42



July 11, 1988

Mr. Alan Barton Thompson & Mitchell Attorney at Law 1 Mercantile Center St. Louis MO 63101

Dear Mr. Barton:

RE: Riverview Industrial Center - Clark Properties

I would like to update you as to the current status of the underground storage tank investigations at the Riverview Industrial Center.

The following steps have been taken:

- 1. The four sites of possible underground storage have been excavated.
- 2. Two tanks have been found: the 16,744 gallon tank in front of the office entrance and the 10,000 gallon tank located near the former site of Bldg. 18.
- 3. Samples of the contents of both tanks were collected and submitted for analysis by Mr. Mike Pinson of Clayco Construction. The water-like sample from the 16,744 gallon tank was submitted to the Metropolitan St. Louis Sewer District. The oil sample form the 10,000 gallon tank was submitted to Clayton Chemical of Sauget, Illinois, for review. Mr. Pinson has received analytical results and will be forwarding them to our office shortly.
- 4. Upon excavation of the past and present tank locations an asbestoslike material was observed in the soil. This material was submitted for analysis by Clayco Construction and according to Mr. Pinson the results do show a small amount of friable asbestos present. These test results also are being forwarded to our office.

Mr. Alan Barton July 11, 1988 Page 2

The State of Missouri and the City of St. Louis do not require the removal of the asbestos. However, if it is left in the ground the provisions of 10 CSR 80-2.030 require that the locations of the asbestos be noted on the title or deed of the property. If the asbestos is removed the state must be notified twenty days in advance. In addition, the state may require that an approved asbestos contractor do the work or at least act as an inspector of the operations. All asbestos removed must be properly containerized and labelled. The above mentioned removal requirements apply even if the asbestos is moved to the asbestos pile behind the facility.

The work remaining to be completed includes the decommissioning, removal and disposal of the 10,000 gallon tank and the decommissioning of the 16,744 gallon tank. The larger tank is situated very near a foundation of the warehouse and its removal may jeopardize the integrity of the building.

If you have any questions regarding these matters, please contact me.

Sincerely,

METCALF AND ASSOCIATES

Karen D acker

Karen D. Acker

Environmental Engineer

KDA/bje

cc: Joseph Ambrose, Mercantile Bank Harold Clark, Clark Properties



City of Saint Louis

DEPARTMENT OF HEALTH AND HOSPITALS

DIVISION OF HEALTH

VINCENT C. SCHOEMEHL, JR.

December 23, 1986

HEALTH COMMISSIONER

Mr. Ray Emerson Riverview Hall Industrial Properties St. Louis Freight Car and Equipment 718 North Third Street, Suite 2000 St. Louis, Missouri 63102

Dear Mr. Emerson:

On December 16, 1986, an inspection was made of your facility, the former GAF complex located at 9215 Riverview Boulevard. This inspection was performed by Mr. Wilson of the St. Louis Health Division, Bureau of Environmental Health, in your presence and with your assistance.

During this inspection, various potentially hazardous chemicals were observed. You indicated to Mr. Wilson that some of these chemicals are surplus and you wish to dispose of them, and that others relating to the boiler may or may not be retained. I have enclosed a list of the above mentioned chemicals and other unknown substances. Mr. Wilson noted in his report that there may be others in the complex not yet identified.

In addition, during Mr. Wilson's inspection, he talked to you about asbestos known to be buried on the property. He also discussed areas covered with a substance that may contain asbestos, namely, the boiler house, the skylight, and the upper walls of the Eliminator Line area.

When the above mentioned chemicals are disposed of, it must be done in an environmentally sound manner consistent with all local, State and Federal regulations. We are requesting that this division be advised of any future disposal plans so that we may monitor such activity.

In regards to the known buried asbestos-containing material, we are requesting all records relating to time, location, and methods of burial. We would also appreciate any other information you have on the burial.

Regarding the areas covered with the possible asbestosbearing materials, we are requesting that samples of these materials be submitted to an EPA approved laboratory for analysis, and that copies of said analysis be submitted to this division. The reason we are requesting this laboratory analysis is that portions of the above surfaces have deteriorated causing a potentially hazardous condition should the material contain asbestos. One final point should be noted regarding the inspection, which may be helpful to you in the future. One properly labeled transformer containing PCB's was observed. As long as this unit remains undisturbed, it is of no concern, except that it must be reported to the U.S. Environmental Protection Agency, telephone number (913) 236-2835. Additional regulations come into force if it is moved. We recommend you contact the EPA for specific information regarding the storage or disposal of the transformer containing PCB.

I realize the above may raise a number of questions. Should you have any, please contact Mr. Lee Huguley or Mr. Thomas Astorino at 658-1000. In any event, I would appreciate a response to this division by January 23, 1987.

Yours truly.

Charles G. Copley

Acting Health Commissioner

CGC:shf

cc: Chester Hines, Jr.
Director of Health and Hospitals

Thomas Nash, Executive Director Office of Business Development

Earl Ray, Commissioner Air Pollution

George Jenkerson Fire Marshall

Harold Clark, President ✓ Riverview Hall Industries

Dr. Valgard Jonsson Assistant Health Commissioner

Thomas Astorino Acting Ass't. Health Commissioner

Lee Huguley Acting Assistant Manager

Enclosure

List of Chemicals and Unknown Substances 9215 Riverview Boulevard

1. Maintenance Building

- 4 55-gallon drums of aqua ammonia
- 1 30-gallon container of muriatic acid
- 5 pounds of glycerin
- ₹ gallon Barium Chloride
- l quart of unknown
- 3 gallons Methyl Ethyl Ketone
- 2 pounds of Rosin Powder

Flas-crete Primer Catalyst

Various unknowns, small containers

Roofing sealer

2. Fire Brick Storage Building

Various unknown containers

3. Boiler House (interior/exterior)

Various boiler treatment chemicals

Sulfuric Acid

4. Area at and near Eliminator Line in newest building

- 1 55-gallon drum, Methylene Chloride
- 2 55-gallon drums, Dichloromethane (Methylene Chloride)
- 1 55-gallon drum, 1-M-Pyrol (N-Methyl-2-Pyrrolidone)

Numerous 55-gallon drums of Chem-Trend

- 5 55-gallon drums, possibly DC-193 Surfactant, in black drums
- 2 55-gallon drums, Boiler Treatment Sludge conditioner

Storage tanks, north of Eliminator Line. Some may have substances still in them.

5. South interior of Eliminator Line area

A. <u>Maintenance area</u>

Paints and primers

B. Lab and office area

Ethyl Alcohol

Acetone

Methanol (Nethyl Alcohol)

Ammonia

File Privarien HAN IND Prop

Microscopic Analysis, Inc.

71 MEADOWLARK LANE ST. LOUIS, MISSOURI 63146 (314) 993-2212

January 20, 1987

National Industrial Applicators, Inc.

5735 Fee Fee

St. Louis, Missouri 63042

Bulk samples from GAF.

Gentlemen:

The bulk samples submitted for asbestos analysis on January 1987, have been analyzed. The analysis for asbestos content by Polarized Light Microscope (PLM) and Dispersion Staining (DS). The results of our analysis are contained below:

LABORATORY NUMBER	SAMPLE I.D./ LOCATION	ASBESTOS FOUND	PERCENT PRESENT		
B-872148	#1 Boiler	Chrysotile	50-75%		
B-872149	#2 Insulation on wall	No asbestos detected	N.A.		
B-872150	#3 Ceiling	No asbestos detected	N . A .		
B-872151	#4 Ductwork	No asbestos detected	N.A.		

Douglas N. Nimmo, CIH

Director

DNN/kn

Riverview Hall Industrial Properties 462 Summit Avenue St. Louis, MO 63042 (314) 731-8181 January 21, 1987

Mr. Charles G. Copley
Acting Health Commissioner
City of St. Louis
Department Of Health And Hospitals
Division of Health

Subject: Former G.A.F. Complex, 9215 Riverview Boulevard

Dear Mr. Copley:

On December 16, 1986, an inspection was made of our facility by Mr. Wilson of the St. Louis Health Division, Bureau Of Environmental Health.

The inspection was followed by your letter dated December 23, 1986 which requested information from us in certain areas and giving us appreciated information regarding a transformer which contains P.C.B's.

Regarding the potentially hazardous chemicals which you listed we have determined that they belong in three (3) catagories:

- 1) Materials which belong to G.A.F. and which will be moved by G.A.F. along with their equipment to another location for their process.
- 2) Materials which will be used relating to building heating and maintenance.
- 3) Disposed of in an environmentally sound manner consistant with all local, state and federal regulations.

At this time G.A.F. has not given us a schedule to remove their materials and equipment. We hope to have that information by 2/1/87.

During the inspection, Mr. Wilson requested samples be taken of suspect asbestos materials and be submitted to an E.P.A. approved laboratory for analysis. Please find test report enclosed.

The samples were obtained by National Industrial Applicators. They were recommended to us as a well qualified asbestos removal/abatement company. We have retained their services to advise us on all asbestos related matters concerning the property.

U.S.
POLLUTION
CONTROL, INC.

April 4,1988

Mr. Mike Pinson Clayco Construction 462 Summit Avenue St. Louis, MO 63042

Dear Mr. Pinson:

This quotation will confirm pricing for transportation and disposal of the PCB contaminated transformer at the Riverview facility. The pricing provided herein is based on a Westinghouse serial #6538623, weighing 7450 lbs oil free, and containing 435 gallons (5650 lbs) of oil contaminated with 562,000 ppm PCB. The transformer will be drained onsite be USPCI personnel, all oil will be transferred into 55 gallon drums, the transformer will be flushed to remove residual PCB contamination and the flushing liquid will be drummed. All PCB contaminated material(oil and carcass) will be handled, disposed of, and transported by USPCI trained personnel.

PRICING

Transportation & Disposal: Oil Transportation & Disposal: Carcass

\$5720.70 \$1593.25

Total: \$6813.95

1313.95

These prices are good for sixty (60) days, payment terms are net thirty (30) days.

Scheduling for this service can be arranged within the present month with no difficulty. Per your request I have forwarded information to your attention, under seperate cover, regarding USPCI's PCB treatment process and specific articles regarding PCB concerns. I trust that you will find this information to be of interest and I am looking forward to be of further service to you.

Respectfully Submitted,

Don Kueneke

USPCI St. Louis



(314) 658-1000

CAROLYN MILLS ENVIRONMENTAL HEALTH OFFICER

City of St. Louis Health Division 634 N. Grand, Room 600 St. Louis, Mo. 63103

A TRACT OF LAND

IN PART OF LOTS 5, 6 8 7 OF THE SUBDIVISION IN PARTITION OF THE ST. CYR ESTATE

AND PART OF LOT 6 8 7 OF THE SUBDIVISION OF THE THOMAS DONNELLY ESTATE k 211 page99 321, 1982 am n Fanke IN U. S. SURVEY 3 ST. LOUIS COUNTY MISSOURI AND PARTLY IN OUTLOTS HISA & HIS OF THE CITY OF ST. LOUIS ALL IN T 46 N-R 7 E SECURED ASBESTOS CEMENT 80 W OR. RIVERVIEW <u>.</u> .

WATER WORKS 120'W. R.O.W